From Polarization to Pluralization: A Deliberative Democratic Approach to ‘Illiberal’ Cultures

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Drawing on the insights from deliberative democracy and agonistic pluralism, this paper suggests a framework for assessing and improving the deliberative quality of public debates on 'illiberal' cultures. The strength of this framework lies in its capacity to transform culturally polarized debates into pluralized public conversations. In order to illustrate this, the paper focuses on the case of 'honour killings' and the public debates it has spawned in recent years in two culturally plural societies; Britain and Germany. The British case in particular provides an excellent example for the real-world approximation of the deliberative framework suggested in this paper. Here, the discursive engagement over the issue of 'honour killing' results in the transformation of an initially polarized public debate into a plural democratic contestation.

Introduction

Liberal societies face increasing difficulties in accommodating the claims of cultural and religious groups who do not share the values and lifestyles of the majority society. These groups are often associated with ‘risk and uncertainty’ and defined in shorthand as ‘problem-cultures’, which are ‘in need of modification and fixating but also difficult to modify or fix’ (Mouritsen 2008:5). Particularly in recent years, the 'illiberal' practices of those groups, such as wearing burkas, forced marriages or 'honour killings' have become central issues in public and policy debates in multicultural societies. These practices are often debated in culturally polarized settings in which minority and majority cultures seem to have nothing in common to start a meaningful conversation with each other. In most cases, addressing illiberal cultural practices without imposing liberal values on cultural minorities or stereotyping them proves to be highly difficult (Phillips and Saharso 2008). The absence of any viable alternative eventually encourages governments in multicultural societies to confront the members of ‘illiberal’ cultures with ‘love it or leave’ types of solutions.

In this paper I problematize such solutions and argue that if suitably amended, the deliberative democratic approach offers the best framework for addressing the ‘problem’ of illiberal cultures and the polarization such cultures cause in multicultural societies. The paper begins with a critique of the mainstream deliberative democratic approach which fails to include illiberal cultural claims in public deliberation, and suggests expanding this approach by drawing on the insights provided by agonistic pluralism. The strength of the deliberative approach I suggest lies in its capacity to transform culturally polarized debates into pluralized public conversations. In order to illustrate this, I focus on the practice of ‘honour killing’ and the controversies it has spawned in two culturally diverse societies; Britain and Germany.

1 Throughout this paper, I use quotation marks around the term of ‘honour killing’ to indicate the contested nature of this concept and to acknowledge the ongoing academic debates on the utility of the term. For examples of such debates, see (Sen 2005); (Meetoo and Mirza 2007).
The paper is composed of four sections. In the first section, I focus on the shortcomings of the mainstream deliberative approach in addressing illiberal cultures, and suggest revising this approach by drawing on the insights of agonistic pluralism. In the second section, I offer a framework for translating the revised deliberative approach into practice and define the criteria upon which the deliberative quality of public debates on illiberal cultures can be judged and improved. In the remaining two sections, I use these criteria to analyze and compare the deliberative quality of ‘honour killing’ debates in Britain and Germany.

1. A deliberative approach to illiberal cultures and deep disagreements

‘The core idea of deliberative democracy’, Amy Gutmann and Denis Thompson (1996:1) argue, ‘is simple: when citizens or their representatives disagree morally, they should continue to reason together to reach mutually acceptable decisions’. This holds also for the resolution of cultural disagreements in multicultural societies. In fact, deliberative democracy is claimed to offer ‘the most adequate conceptual and institutional framework’ for societies characterized by cultural, ethnic and religious pluralism (Benhabib 1996:6). This claim is based upon the numerous advantages of this approach over others in the context of culturally plural societies. Various scholars have argued, and some have empirically shown, that deliberation helps resolve cultural conflicts (Deveaux 2003; 2006); empower members of cultural minorities (Mayo 2004); enhance cross-cultural cooperation (Bohman 1996), promote mutual understanding (Gutmann and Thompson 2004) and social learning across conflicting groups (Kanra 2009); and generate democratically legitimate outcomes even in the face of the toughest moral disagreements (Gutmann and Thompson 1996). Deliberative decision-making process ensures that cultural minorities have ‘a lasting effect on policy outcomes’, as on this account decisions are made not only by counting votes but also by sharing reasons (Williams 2000:125).

Generally speaking, deliberative democrats agree that the best way to resolve culturally contested issues is to provide cultural minorities with the opportunity to articulate and justify their concerns in public forums. Nevertheless, they disagree over the rules of engagement and the scope of deliberation in such forums. The divisions among various deliberative democrats become particularly visible when it comes to the question of whether deliberative forums should offer a platform for engaging with ‘illiberal’ cultures and for resolving seemingly irreconcilable differences between these cultures and the majority culture.

The vast majority of deliberative democrats believe that the search for deliberative solutions should stop when cultural demands violate liberal values (see for example, Gutmann and Thompson 1996; Valadez 2001; Quong 2002; Gutmann 2003), or when conflicts at hand prove to be irreconcilable (see for example, Cooke 1997; Bennett 2007; Erman 2009). Amy Gutmann (2003:43), for example, argues that only those claims that defend the principles of ‘equal freedom, opportunity and civil equality’ can be subject to public deliberation.
Similarly, Seyla Benhabib asserts that norms governing the procedures of deliberation cannot be neutral; they should be in line with the fundamental principles of liberalism. This means that the claims put forward in the course of public deliberation should comply with the principles of universal human rights, respect for persons, justice and egalitarian reciprocity (Benhabib 1992:45-46). When seen from this rather mainstream deliberative perspective, deliberative solutions seem to be pertinent only in cases where cultural claims meet the terms of fundamental individual rights and where conflicts between cultures prove to be ‘principally reconcilable’. If we follow the presuppositions of the mainstream deliberative approach, deliberative democracy has nothing to offer in the face of ‘illiberal’ cultural claims, especially if such claims entail ‘irreparable harm’ to members of cultural communities (Quong 2004:49).

In this paper I follow a different path and argue that if amended, the deliberative democratic approach offers the best framework for engaging with ‘illiberal’ cultures. The most important amendment I suggest is to see defenders of ‘illiberal’ cultural practices as legitimate participants in public debates and deliberation. I develop this approach based on the insights provided by various democratic theorists—both deliberative and otherwise, including John Dryzek, Monique Deveaux, William Connolly and Nancy Fraser—and through a close examination of the ‘honour killing’ debates in Britain and Germany. Let me briefly explain what these scholars suggest and how I combine their strengths to develop a comprehensive deliberative approach to ‘illiberal’ cultures and the polarization they cause in culturally plural societies.

To start, following Dryzek (2000), I understand deliberation in broad terms ‘as contestation of discourses in the public sphere’. The existing literature defines this approach commonly as a ‘macro’ deliberative approach in contrast to a ‘micro’ deliberative approach (Dryzek 2010; Hendriks 2011; Parkinson and Mansbridge 2012 ). The main difference between these two approaches is that whilst micro theories of deliberative democracy tend to focus on deliberation in relatively small groups in structured and formal deliberative forums (such as citizens’ juries and deliberative polls), the macro theories draw our attention to the discursive side of democracy that is the argumentation and contestation that takes place within the broader public sphere (see for example, Benhabib 1996; Habermas 1996; Mansbridge 1999; Dryzek 2000; Chambers 2009; Parkinson and Mansbridge 2012 ). The macro deliberative theorists are interested in ‘the ebb and flow of public debate carried on in the media, in private conversations, in formal and informal settings, from pubs to parliaments and back again’ (Parkinson 2004:380).

By adopting a macro-deliberative approach, I do not mean to deny the importance of structured forums such as committees of inquiry or public consultations which are usually, but not always, created by government agencies to resolve the contested issues at hand. Culturally plural societies can obviously benefit from such forums. If designed carefully, structured forums can facilitate a better understanding of the debated issues and help alleviate the disagreements between minority and majority cultures. The existing literature provides numerous insights, both normative and empirical,
in terms of how such forums should look like in the face of cultural diversity, where they should take place, who should participate in them and on which terms (see, for example, Williams 2000; Young 2000; Deveaux 2003; Oman 2004; von Lieres and Kahane 2007; Walsh 2007; Eisenberg 2009). Among them, Deveaux's approach merits particular attention as she offers the most extensive treatment of cultural conflicts to date from the perspective of deliberative democracy. Given this, when defining the conditions under which structured can contribute to strategies of addressing 'illiberal' cultural claims, I built upon the insights she provides.

Deveaux challenges the normative assumptions of the mainstream deliberative approach and argues that deliberation can help resolve cultural conflicts if it focuses on the conflicting interests rather than the conflicting identities of the participants (Deveaux 2006:101-5). This argument stems mainly from her understanding of intercultural conflicts. According to Deveaux, intercultural conflicts are often about the strategic interests of factions of cultural communities rather than about deep differences of value between different cultures. She thus suggests shifting the focus of deliberative efforts from the intercultural to the intracultural dimension of those conflicts (Deveaux 2003; 2006). The strength of this proposal lies in its rejection of an essentialist notion of culture which views cultures as unified homogenous entities. Building upon Deveaux, I argue that structured forums can help resolve cultural conflicts if they provide a space for conflicting interpretations of culture and help reveal intracultural differences that exist within cultures.

Deveaux's focus on intracultural differences is not the only point that makes her approach appealing for the deliberative perspective I develop in this paper. I find her attempt to incorporate 'illiberal' cultural claims in the deliberative democratic approach equally important. In contrast to the mainstream deliberative democrats discussed above, Deveaux rightly argues that we cannot rule out some claims prior to deliberation just because they are at odds with liberal principles. If such claims are crucial in the dispute, ‘they need to be put on the table where they can be discussed, evaluated, and contested’ (Deveaux 2006:220). Yet while making this claim, Deveaux relies on ‘a purely procedural account of democratic deliberation’ (Baumeister 2009) and avoids engaging with a series of questions that may invite her to take a more substantial approach to deliberation. She thus provides little guidance in terms of how we should envision a dialogical engagement with 'illiberal' cultures, what we should expect from such engagements, and perhaps more importantly how we should ensure that the inclusion of 'illiberal' groups in public deliberation does not intensify the existing conflicts between minority and majority cultures. With regards to the last point, there is ample evidence in the existing literature showing that in culturally polarized settings, dialogical attempts can easily exacerbate rather than alleviate cultural conflicts (see, for example, Sanders 1997; Yuval-Davis 1997:205; Wikan 2002:160; Bennett 2007). As such, any suggestion to include 'illiberal' cultural claims in public deliberation should remain attuned to such dangers.

At this point, I suggest drawing on the insights offered by the theory of 'agonistic pluralism' which is a stream of democratic theory that starts from
the view that conflicts in pluralist societies are inevitable and aims to offer a constructive way of engaging with these conflicts. There are important parallels between the aspirations of the deliberative theory I defend and agonistic pluralism. I am aware that at first glance, bringing these two approaches together may appear contradictory as the existing literature tends to present deliberative democracy and agonistic pluralism as mutually exclusive alternatives (see for example, Mouffe 1999; Little 2007; Norval 2007). Agonistic pluralists fiercely distance themselves from deliberative democracy which, they argue, eradicates the differences between conflicting groups in the name of achieving consensus (Mouffe 2000a; 2000b). In establishing this argument, agonists usually attribute a false unity to deliberative democracy and treat it as a singular entity. A close examination of both approaches, however, reveal that neither deliberative democracy nor agonistic pluralism constitutes a theoretical unity or adheres to a single project. In fact, a cross-fertilization between certain variants of these approaches is both possible and desirable. The theory of agonistic pluralism, and most notably the notion of ‘agonistic respect’ as developed by William Connolly (2002; 2005) fills an important gap in deliberative theory and offers a useful medium for facilitating democratic engagement in the face of ‘illiberal’ cultural claims and deep disagreements.

Agonistic respect, Connolly notes, is a ‘kissing cousin’ of ‘liberal tolerance’, yet at the same time, it is substantially different from liberal tolerance (Connolly 2005:123). While liberal tolerance presumes the superiority of majority identity, and thus does not ask the majority to question its own position, agonistic respect requires ‘comparison and critical negotiation’ between majority and minority identities (Connolly 1993:382). Agonistic respect is based on the acknowledgement that ‘our encounter with the other is always conditioned by the interpretive framework (or identity) we bring to it’ (Schaap 2006:269). It refers to a mode of political engagement in which liberalism is not treated as a dogma; rather, it is rooted in the principle that says ‘always listen to the other side’ (Tully 1999:174).

What makes Connolly’s account more inclusive and therefore appealing for the perspective I take in this paper is that Connolly rejects drawing a ‘definitive line in advance between acceptable and unacceptable candidates’ of democratic contestation (Wenman 2008:210). This, however, does not mean that Connolly offers a mode of political discourse without any limits or exclusion (Glover 2011). In fact, Connolly admits that there will be limits to pluralism, but the main point is: ‘we often do not know with assurance exactly what those limits must be’ (Connolly 2002:xxix, emphasis in original). Connolly broadens the terms of inclusion by shifting the focus from ‘entry conditions’ to the ‘process’ of democratic contestation. The aim here is to provide ‘a framework for public debate rather than agreement on a set of universal values’ (Malik 2008:92). In what follows, I want to suggest one such framework for engaging with illiberal cultural claims in multicultural societies. I will then apply this framework to analyze the public and policy debates on ‘honour killings’ in multicultural societies.
2. From theory to practice of deliberation in multicultural societies

A model of deliberative democracy that is equipped to deal with illiberal cultural claims requires considerably fewer constraints and allows much more moral disagreement in deliberation than the most proponents of this approach permit. The framework I suggest emphasizes three central criteria: i) inclusion based on ‘agonistic respect’; ii) interaction; and iii) influence. Let me briefly explain each criterion before moving on to their investigation in the context of ‘honour killing’ debates in multicultural societies.

i) Inclusion based on ‘agonistic respect’

Inclusion is the most important criterion of the deliberative democratic approach. If we understand public deliberation as a ‘web of talk’ as Simone Chambers (1996:197f) suggests, then there is no doubt that ‘[t]he more people caught in that web, the better the guarantee that all possible objections to the proposed claims have been given a hearing’. Although most advocates of the deliberative approach would agree with this claim, they emphasize various other constraints which lead to the exclusion of some voices from public deliberation. The criterion of inclusiveness that I suggest brings together the strengths of the three scholars I have mentioned above; Dryzek, Deveaux and Connolly. Similar to Deveaux, I argue that all viewpoints, including those that are characterized as ‘illiberal’ or ‘dogmatic’, should have a legitimate place within democratic discourse. Yet in contrast with Deveaux, I do not insist on the condition that asks participants to frame their views as ‘strategic interests’ and not as identity claims. This condition works to privilege some participants over others and thus conflicts with the principle of inclusion understood in broader terms. In this context, Connolly’s notion of ‘agonistic respect’ offers a better starting point for expanding the terms of inclusion in public deliberation. But how exactly should we envision such inclusion in practice?

If we understand deliberation in terms of a constellation of discourses in the public sphere, as suggested by Dryzek, we can also envision inclusion in discursive terms. Dryzek argues that inclusion does not necessarily mean that all affected by collective decisions should be physically present in the process of making them. It can be understood in terms of the inclusion of discourses in public debate and deliberation (Dryzek 2010:30-35). In other words, what is important for the discursive notion of inclusion is not so much that everyone participates in the public debate and discussion, but that all existing discourses on a particular issue are included and addressed within those debates. The same can be claimed for public and policy debates over illiberal cultural practices. When seen from a perspective of discursive democracy, including those people with whom one fundamentally disagrees does not necessarily involve having face-to-face encounters with them in structured forums. It would suffice, both for the purposes of inclusion and for generating

2 Dryzek and Niemeyer (2008:481) argue that understanding inclusion in discursive terms offers ‘one way to redeem the promise of deliberative democracy when the deliberative participation of all affected by a collective decision is infeasible’.
democratic legitimacy, if the existing discourses on a contested issue are included in public debate and deliberation.

In this context, the notion of 'subaltern counterpublics' suggested by Nancy Fraser (1997), offers a useful heuristic for conceptualizing illiberal cultural groups and discourses. Fraser takes the multiplicity of the public sphere as her starting point and draws our attention to the 'parallel discursive arenas' in which members of subaltern publics 'invent and circulate counter discourses' of their identities, interests and needs' (1997:81). Her emphasis on a multiplicity of publics illuminates the 'contestatory relationship' between counterpublics and dominant publics (Ibid: 82). Scholars of deliberative democracy, or those sympathetic to this approach, have long emphasized the vital importance of counterpublics, either as a means for expanding participation in decision-making or as a vitalizing force for creating democratic culture.³

However, when talking about subaltern counterpublics, they usually imagine such groups and their discourses as necessarily progressive and liberal, such as the feminist counterpublics of the late twentieth century. On their account, the vital importance of counterpublics lies in their transformative and emancipatory potential (Asen 2000:429). Contrary to this view, however, Fraser rightly notes that subaltern counterpublics are not always necessarily liberal, progressive and transformative. Some groups, Fraser tells us, may be explicitly illiberal, yet insofar as they emerge 'in response to exclusions within dominant publics, they help expand discursive space' (Fraser 1997:82). In general, she adds, 'the proliferation of subaltern counter-publics means a widening of discursive contestation and that is a good thing in stratified societies' (Ibid). ⁴ In other words, it is not only the liberal/progressive counterpublics but also the illiberal counterpublics which can contribute to wider discursive contestation and enrich what Cass Sunstein (2009:150) calls the 'argument pool' of a society.

Despite their similar function however, there are important differences between liberal and illiberal counterpublics. In her detailed analysis of subaltern counterpublics, Cathrine Squires (2002) offers a compelling way of capturing these differences. She suggests distinguishing among three types of partly overlapping counterpublics: (i) resistant counterpublics, which are usually liberal and progressive and thus the most attractive type of counterpublics for deliberative democrats; (ii) enclave counterpublics, which deliberately separate themselves from wider publics; and, iii) satellite counterpublics, which seek separation from other publics for reasons other than oppressive relations, for example due to their separate cultural or religious convictions (such as the Amish in the U.S.).

When seen through this alternative vocabulary, we can categorize most illiberal groups and their discourses under the enclave or satellite

³ See for example Dahlberg (2007); Asen (2000); Sunstein (2009) and Loehwing and Motter (2009).
⁴ Fraser (1997:80) defines stratified societies as those 'whose basic institutional framework generates unequal social groups in structural relations of dominance and subordination'.
counterpublics. What distinguishes these counterpublics from the resistant ones is that they usually stay in their 'own orbits' and cross paths with wider publics 'only at points of crisis' (Squires 2002:464). As I will show below, the cases of 'honour killings' and the public debates they create in multicultural societies display excellent examples for the emergence of all three kinds of counterpublics and discourses in the public sphere. To satisfy the criterion of inclusiveness that I suggest here, and based on the principle of 'agonistic respect', public and policy debates over illiberal cultures should include not only resistant publics but also those characterized as enclave and satellite counterpublics.

**ii) Interaction among various publics**

If we acknowledge that there are not one but many publics, then we should also say something about how and where these publics can meet and have a meaningful dialogue with each other. The criterion of interaction that I will suggest here aims to do so. But first let me clarify the terminology used within the deliberative democracy literature with respect to the various publics within the public sphere.

Deliberative democrats usually distinguish between 'weak' and 'strong' publics or 'between informal' and 'formal' sites of the public sphere, and assign different roles to them (Habermas 1996). Weak publics are found within the informal public sphere and characterized mainly through their lack of political power in decision-making. As Habermas (1996:362) puts it, 'relieved' from the task of decision-making, the main function of the weak publics is to identify social problems, bring them to the attention of society at large and contribute to opinion formation within civil society. The counterpublics defined above fall clearly into the category of weak publics. In contrast to weak publics, strong publics are responsible for decision-making. They assume this role within formal political institutions, for example in the parliament. Here, opinion formation and decision-making combine. Ideally speaking, from a perspective of deliberative democracy, weak publics should feed into strong publics within formal institutions and eventually affect the process of decision-making there. Habermas describes this process as the 'circulation of communicative power' and views weak publics in civil society as the source of this circulation (Habermas 1996, chapter 8).

This view brings out the relevance of the tools that inhabit the area between the formal and informal spheres, or what Gutmann and Thomson (1996:12) call 'the land of middle democracy'. These include not only the tools that reach out from the informal public sphere, such as direct protest and commissioned reports, but also those which reach from the formal sphere, like commissions of inquiry, parliamentary committee hearings and public consultations with members of cultural communities (Parkinson and Bavister-Gould 2009). Theoretically speaking, all these tools offer significant 'access points' to decision-making circles and serve as what Carolyn Hendriks (2006:501) calls 'mixed discursive spheres' for combining formal and informal modes of deliberation. In fact, without such spheres and procedurally guaranteed links between informal and formal spheres, 'the legitimacy
generated by the former cannot reasonably claimed by the latter’ (Squires 2002:134).

To sum it up, the criterion of interaction requires paying particular attention to the tools that inhabit the area of ‘middle democracy’. It is my contention that political systems with a broader area of ‘middle democracy' offer a more conducive context for the interaction between weak and strong publics. This area embraces ‘virtually any setting in which citizens come together on a regular basis to reach collective decisions about public issues—governmental as well as nongovernmental institutions’ (Gutmann and Thompson 1996:12). This, however, is not to suggest the endorsement ‘any’ participatory tool that exists within this area. Rather, it is important to approach to the area of ‘middle democracy’ with great caution, especially if it entails interactions with government institutions. When culturally contested issues are at stake, the involvement of government institutions in public deliberations—as facilitators and/or ‘dialogue partners’—may introduce problems of their own that are worthy of further consideration. Their involvement may lead to the essentialization of cultural identities and the intensification of the existing conflicts between minority and majority cultures. I will return to this point in the context of ‘honour killing’ debates in Britain and Germany.

iii) Influence

The last criterion I want to suggest emphasizes that deliberation is not only about the contestation and interaction of multiple publics. It is also about the question of whether these publics influence each other. If we follow the direction Habermas suggests in terms of the ‘circulation of communicative power’, the success of deliberation depends on the question of whether claims made within the civil society by various publics have any influence on the collective decisions made by parliaments and governments. But how can we evaluate the extent to which decisions in formal institutions have been influenced by deliberations in the informal public sphere? This is largely an empirical question. It requires investigating the discourses of various publics on a particular issue, the interaction of these publics with each other and the outcome of these interactions. One useful empirical tool to track the influence of weak publics over strong publics is suggested by the scholars of framing theory (Schoen and Rein 1994; Benford and Snow 2000; Ferree, Gamson et al. 2002; Fischer 2003; Bacchi 2010). Drawing on the insights provided by this body of literature, we can map out the discourses of various publics on a particular issue by conducting a frame analysis.

A frame is usually understood as specific problem representation. Each frame implies a different definition of problem (diagnosis), a proposed solution to the problem (prognosis) and a call for action (who is responsible for solving the problem) (Benford and Snow 2000). In the course of public deliberation, different actors develop their own frames of an issue based on ‘their own ideological principles and institutionally specified roles’ (Pan and Kosicki 2001:43). In order to assess the influence of the frames employed by counterpublics within the process of formal decision-making, I suggest focusing on the frames used by public authorities who are directly involved in
decision-making roles, and those employed by various counterpublics who attempt to influence them. The interaction between these frames can be seen as framing contestations, which when successful, results in the transformation of the frames employed by public authorities. As was noted before, in the face of illiberal cultural claims this process should also involve the frames of illiberal counterpublics.

3. ‘Honour killing’ debates in Britain and Germany

‘Honour killing’ is the murder or attempted murder of young women by family members on ‘cultural grounds’ for behaviour said to offend the principles of community honour. I choose to focus on these murders as they present the most extreme example of culturally controversial practices; nowhere does the depth and seriousness of cultural differences appear more evident than in the cases of ‘honour killing’. In culturally plural societies, ‘honour killing’ is usually depicted as emblematic of bigger issues such as the presence of deep differences between minority and majority cultures, the incompatibility of minority and majority life styles (Grillo 2008), the failed integration of immigrants in liberal societies (Beckett and Macey 2001) and the oppression of women in traditional cultures (Phillips and Saharso 2008).

When seen from a deliberative perspective, the most striking aspect of the ‘honour killing’ cases concerns the seeming impossibility of deliberation between advocates and opponents of these murders. In multicultural societies, these cases usually lead to a polarization which may be defined as the process through which an extremely diversified public is coalesced in two mutually exclusive groups (King and Anderson, 1971:244). Polarized debates often delineate the issues at hand in a bi-polar way by drawing a line between two simple answers and asking people to take a stand on one side of the line or the other (Becker et al., 2003:183). In the case of ‘honour killing’, this goes hand in hand with the stigmatization of entire immigrant communities as inclined to criminal practices (Ewing 2008; Gill 2006; Hellgren and Hobson 2008) and the ‘crystallization of boundaries’ making any type of boundary crossing or boundary blurring difficult, if not impossible (Zolberg and Woon, 1999:9). The two sets of voices, one condemning ‘backward’ cultures, the other defending them, appear to have no ground in common on which a meaningful conversation between them might take place (Sen, 2005:52).

I take the polarized setting coalescing around the issue of ‘honour killing’ as my starting point and explore the prospects for deliberation in such settings in two culturally plural democracies, Britain and Germany. I focus on the British and German ‘honour killing’ debates because of both their similarities and differences. With respect to the former, in both countries ‘honour killing’ became a topic of public controversy around the same time—in Britain in 2003 after the murder of Heshu Yones, and in Germany in 2005, after the murder of Hatun Sürücü. In both cases, the issue of ‘honour killing’ mobilized similar types of civil society actors and advocacy groups such as women’s and human rights activists; immigrant and Muslim organizations; and the media. The socio-political context that gave rise to the ‘honour killing’ debates was characterized in both countries by the failure of multiculturalism and the
inability of traditional migrant communities to integrate into mainstream society. This went hand in hand, in both Britain and Germany, with the ‘Islamization’ of identities and issues in relation to these communities (Linder, Möhring et al. 2010). Particularly in the post 9/11 era, the dominant public discourse in both countries echoed the ‘clash of civilizations’ thesis offered by Samuel Huntington (1993), and the ‘multiculturalism is bad for women’ thesis as advocated by Susan Okin (1999). The dominant public discourse defined Islam as hampering integration and drew attention to the gender oppression that is claimed to occur in predominantly Islamic cultures.

It is perhaps less surprising that within this already charged political field in both Britain and Germany, the government agencies defined ‘honour killing’ as a culturally specific form of murder that occurs only within certain migrant communities. The murder of Heshu Yones in Britain in 2002 and the murder of Hatun Sürücü in Germany in 2005 were debated along very similar lines. In both cases, government agencies, most notably the courts, explained the murder of these young girls to wider publics by employing culture-based narratives and drawing attention to the irreconcilable differences that exist between majority and minority cultures (Brandon and Hafez 2008:117). Given the already existing scripts about gender, culture, immigration and Islam in both countries, these explanations had no difficulty gaining traction and quickly became the dominant public view on ‘honour killing’. In both countries, the media played an important role in establishing and sustaining this dominant view through sensational reporting of these murders.

The culture-based frames of ‘honour killing’ were arguably the most dominant, but not the only problem definitions of ‘honour killing’. In both Britain and Germany, the issue of ‘honour killing’ also led to the emergence of counterpublics employing alternative problem definitions of these issues. These consisted of mainly the resistant and illiberal enclave counterpublics.

The resistant counterpublics of ‘honour killing’ debates

In both Britain and Germany, the dominant framing of ‘honour killing’ as a culturally specific form of murder led to the emergence of resistant counterpublics and brought their gender-based problem definitions to the fore. The resistant counterpublics were present in both British and German debates, yet there were important differences in terms of their internal composition. Different types of actors contributed to the formation of resistant counterpublics in these democracies.

In Britain, the feminist counterpublics were the most visible examples of the resistant counterpublics of the ‘honour killing’ debates. They emerged mainly as a result of the discursive efforts of various women’s organizations and advocacy groups working in the area of gender-based violence long before government agencies took these issues up. The women’s organizations such as the Southall Black Sisters (SBS), the Newham Asian Women’s Project, the Iranian and Kurdish Women’s Rights Organization, Karma Nirvana and Imkan engaged in a broad range of activities, from public education to research and advocacy in areas concerning women’s rights violations. Despite their internal
differences, these organizations aimed to challenge the dominant, culture-based frames of ‘honour killing’ as employed by government agencies and the mainstream media. In their discursive contestations, they offered alternative problem definitions of ‘honour killing’ by employing either gender-based or hybrid frames of these issues\(^5\). In either case, they problematized exclusively culture-based interpretations of ‘honour killing’ and protested the courts when the courts accepted cultural reasons as mitigating factors and convicted killers of manslaughter and not murder.

In Germany, the major actors who contributed to the formation of resistant counterpublics were substantially different from those in Britain. The resistant counterpublics in Germany were not composed of feminist groups or feminist discourses. Leading feminist figures such as Alice Schwarzer built ‘frame alliances’ with the state and defined ‘honour killing’ as a culturally specific form of murder occurring only in Islamic cultures (see for example, Schirrmacher 2006). They justified this viewpoint by pointing to the ‘authentic’ stories about the gender violence in Islamic cultures told by selected cultural insiders (such as Necla Kelek and Seyran Ateş). These stories served to reinforce rather than challenge the dominant frames of ‘honour killing’ as employed by government agencies. The efforts to form resistant counterpublics came mainly from migrant organizations, such as the Turkish Union in Berlin-Brandenburg (Türkische Bund Berlin-Brandenburg, TBB); from a group of academics who wrote an open petition to the weekly newspaper *Die Zeit* and scrutinized the reliability of the stories told by authentic informants (Karakasoglu and Terkessidis 2006); and from two political parties: the Left (*Die Linke*) and the Greens (*Bündnis 90/Die Grünen*). All these actors criticized the culture-based frames of ‘honour killing’ for stigmatizing cultural and religious minorities and for failing to capture the complexity of these tragic events.

Besides civil society actors, in both democracies some mainstream institutions have also contributed to the emergence of the resistant counterpublics. In Britain, the Crown Prosecution Service, and in Germany, the aforementioned political parties employed a gender-based definition of ‘honour killing’ and contributed this way to the formation of resistant counterpublics. Arguably, it is not surprising to see that the resistant counterpublics received some institutional support as there was no deep disagreement between these publics and the government agencies. Both sides agreed that it is wrong to kill women for any reason. This provided a ‘common ground’ between the resistant counterpublics and government agencies. What posed a challenge both for government agencies and the resistant counterpublics were the claims put forward by members of illiberal cultural groups asserting the need to kill women if they fail to follow honour codes. It was the presence of these claims that brought to the fore the deep disagreements between majority and minority cultures. Let us now look closely to the arguments of these groups and the role they played in the

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\(^5\) Hybrid frames are those which define ‘honour killing’ as an issue that sits at the intersection of culture and gender. In this view, honour killing is a violence against women that occurs predominantly in traditional immigrant communities.
framing contestations over the meaning of ‘honour killing’ in Britain and Germany.

The illiberal enclave counterpublics

Besides the resistant counterpublics, in both Britain and Germany the issue of ‘honour killing’ also made the illiberal enclave publics visible. These have consisted of individuals and groups who defended the practice of ‘honour killing’ on cultural grounds. As discussed earlier, different from the resistant counterpublics, the enclave publics came to the surface only at the point of crisis, for example, when a girl was killed in the name of honour. The aftermath of each case of ‘honour killing’ served as a what Paul Chilton (1987) calls a ‘critical discourse moment’. These moments typically stimulate commentary from a variety of actors and bring the existing discourses on a particular issue to the surface (Gamson 1992:26). The critical discourse moments after ‘honour killing’ cases made the voice of illiberal enclave publics visible to the broader publics. In both Britain and Germany, the media played the most important role in terms of rendering the repressive discourses of these publics visible. For example, after the murder of Hatun Sürücü in Germany, the media reported that three school boys had claimed that Hatun had deserved to be killed as ‘the whore lived like a German’ (Süddeutsche Zeitung, 25.02.2005; Die Zeit, 09.03.2005). Similarly, after the murder of Banaz Mahmod in Britain, the media reported that a group of Kurdish men had threatened to kill Banaz’s father if he failed to kill his daughter (The Guardian, 11.06.2007). In the case of Heshu Yones, the British media reported that dozens of Kurdis had appeared in front of the court to show solidarity with Heshu’s father on the day he was sentenced (The Times Online, 17.06.2007).

In both Britain and Germany, the illiberal enclave publics have strengthened (both through their talk or silence) rather than challenged the dominant understanding of ‘honour killing’ as a culturally specific type of murder. This may raise the question of whether we can still call them counterpublics. What makes the discourses of these publics ‘counter’ is obviously not the ‘transformative’ or ‘emancipatory’ potential they promise as in the case of the resistant feminist counterpublics, but simply their rejection of the liberal norms of mainstream society. This rejection stems mainly from the exclusion of these groups from dominant publics and can thus be seen as an expression of what Ayelet Shachar (2001:35) calls ‘reactive culturalism’. According to Shachar, a ‘reactive culturalism’ usually emerges as a response to ‘assimilation pressures’ in culturally plural societies and can be expressed in a variety of ways, such as through a rigid reading of a group’s textual sources or close control of the behaviour of group members, most notably that of women. As such, in instances of reactive culturalism the images of women often become the symbol of a group’s ‘authentic’ cultural identity (Shachar 2001:36).

We see all these attributes in the case of ‘honour killing’, especially in the discourses of those who defend these crimes on cultural grounds. In these discourses, women are represented as moral standard bearers upon whom
the family’s honour and the group’s ‘authentic’ identity rest. What is perhaps more striking is that this identity is often constructed in a mutually exclusive manner in opposition to the identity of the majority culture. In Germany, illiberal enclave publics defined their ‘authentic identity’ in opposition to German identity, blaming the victims of ‘honour killing’ for acting ‘like a German’. In both countries, these discourses served to justify the presence of the deep disagreements between liberal and illiberal cultures and pointed out the lack of ‘common ground’ upon which a meaningful dialogue between the two could be established. Yet, as I will show in detail below, the policy makers in Britain and Germany engaged differently with the discourses of illiberal enclave counterpublics.

4. Judging the deliberative quality of ‘honour killing’ debates

i) Approximating the condition of inclusiveness based on ‘agonistic respect’

As argued before, in order to qualify as inclusive, democracies should ensure that the counterpublics (both liberal and illiberal) are not cut off from the conversations on culturally contested issues. The inclusion of the liberal resistant counterpublics in public and policy debates seems to be less of a problem for democracies. It is more likely for liberal counterpublics to find some sort of institutional support in liberal democracies. On the contrary, there is usually very limited, if any, overlap between the vocabularies of illiberal counterpublics and ‘strong’ publics in liberal societies. This, however, should not be seen as a reason to exclude illiberal counterpublics from the public and policy debates on issues that affect them directly.

Against this backdrop, let me first start with the comparison of two democracies in terms of their capacity to include liberal resistant counterpublics in public and policy debates on ‘honour killing’. In Britain, the feminist counterpublics based in various women’s organizations have been the major actors of the ‘honour killing’ debates. Institutional and discursive opportunity structures in Britain (such as the presence of the Women’s National Commission at the time of investigation) offered a particularly favourable context for the inclusion of these counterpublics in public and policy debates. The inclusion of feminist counterpublics in the debates over ‘honour killing’ made an important difference to the way ‘honour killing’ was debated in this country. I will come back to this point later while discussing the criterion of influence.

In contrast to Britain, in Germany the resistant counterpublics remained at the margins of the meaning-making and decision-making processes. This stemmed partly from the weakness of these counterpublics (arguably due to the lack of feminist support) and partly from the peculiarities of the German political system. The political system in Germany recognizes political parties as the major meaning-making institutions and privileges individuals and organizations with close ties to political parties. The only route that is open for resistant counterpublics to make their voice heard is political parties. At first glance, this may appear as an opportunity that enables the inclusion of the
resistant counterpublics in public and policy debates. However, this inclusion should be considered in the context of strict party discipline in Germany. Here, political parties maintain strict party discipline and are obliged to express unified frames on public and policy issues. This forces not only the political parties, but also the organizations affiliated with them, to limit their problem definitions over contested issues. This has important implications for the deliberative treatment of contested issues including ‘honour killing’. The strict party discipline in Germany serves to impoverish what Cass Sunstein (2002) calls the ‘argument pool’ of a society and adversely affects the deliberative quality of the debates both within and outside of the parliament.

While the resistant counterpublics and their gender-based frames were largely excluded from the ‘honour killing’ debates in Germany, the illiberal counterpublics received unprecedented attention. This was mainly due to the fact that the culture-based explanations of ‘honour killing’, as represented by these publics, resonated more with the existing socio-political context which was characterized by the presence of ‘parallel societies’ and irreconcilable differences between minority and majority cultures. The German media played a crucial role in bringing the repressive discourses of illiberal counterpublics to the fore. These discourses were also present in the course of the parliamentary debates. Parliamentarians often made direct reference to statements of illiberal counterpublics as represented in the media and used them as evidence to justify the dominant view about the inability of minorities from traditional cultures to integrate in German society. The discourses of illiberal counterpublics were included in parliamentary debates, but their inclusion served only to reinforce the culture-based frames of ‘honour killing’ and further polarized the ‘honour killing’ debates. As such, the German ‘honour killing’ debates featured strong antagonistic elements. The lack of ‘agonistic respect’ toward illiberal counterpublics prevented the transformation of antagonism into agonism. In Germany, the inclusion of illiberal counterpublics in public and policy debates was rather based on the principle of ‘hegemonic listening’ which only listens to what stabilizes the prevailing circumstances’ (Varela and Dhawan 2006:436; Rostock and Berghahn 2008:354).

The British parliamentary debates over the issue of ‘honour killing’ were substantially different to those in Germany. Firstly, parliamentarians did not use media reports on ‘honour killings’ as a source of evidence; rather they relied on reports produced by women’s organizations and gave direct references to the government inquiries conducted on the issue of ‘honour killing’. This is not to say that ‘honour killing’ was debated more ‘objectively’ in Britain, but British parliamentarians were obviously more informed than those in Germany. Secondly, the British parliamentary debates included the discourses of illiberal counterpublics over ‘honour killing’ in a different way. The parliamentary debates, particularly those that occurred in the House of Lords, presented the examples of inclusion based on ‘agonistic respect’. Parliamentarians placed strong emphasis on the need for understanding the motivations behind ‘honour killing’ and sought to provide examples of a similar notion of honour at work within mainstream British society. In doing so, they aimed to relieve the tension between ‘us’ and ‘them’ and transform the debate
from antagonism to into agonism. This led to the emergence of culturally-sensitive frames of ‘honour killing’ that were not present in the German case.

ii) Approximating the condition of interaction

As discussed before, for democracies, approximating the condition of interaction means to provide spaces for the deliberation with each other of multiple publics. Such spaces can fulfill two important functions. First, their presence can ensure that ‘people who spend a lot of time in enclaves are also exposed to competing views’ (Sunstein 2009:158). This is not to say that enclaves are necessarily bad for deliberative democracy. On the contrary, enclaves can offer protected discursive sites for members of subordinated groups to ‘formulate oppositional interpretations of their identities, interests and needs’ (Fraser 1997:81). Yet, when people communicate only in enclaves, they may easily encourage one another not to hear anyone else (Mansbridge 1996:58). In this context, as Jane Mansbridge (1996:58) argues, any suggestions to improve democracy ‘need to show not only how well they foster deliberation in general but also in general how they facilitate or impede enclaves of oppositional discourse’. In this sense, approximating the condition of interaction means to tie closed communities into broader political conversations.

Second, from a deliberative perspective, approximating the condition of interaction means enabling sustained communication between ‘weak publics’ and ‘strong publics’, that is, between the civil society and state. As previously discussed, when seen from a macro-deliberative perspective, deliberation entails both formal-decision making institutions, such as legislators, courts and administrative processes, and a series of informal institutions, such as civic groups, social movements and mass media (Mansbridge 1999; Benhabib 2002:121; Chambers 2009; Dryzek 2010). In this sense, approximating the condition of interaction also means to establish mechanisms that help tie informal debates in civil society with formal decision-making mechanisms. This shows the relevance of the tools that inhabit the ‘land of middle democracy’ between civil society and state (Gutmann and Thompson 1996:12). These are both the tools that reach from informal to formal public spheres (such as direct protest and commissioned reports) and those which reach from formal to informal spheres (such as parliamentary committee hearings and public consultations with the members of affected communities). The governments in both Britain and Germany utilized following tools to better understand the root causes of ‘honour killing’ and to tackle these causes effectively:

a. State-dialogues with ‘affected communities’

In recent years, in Britain and Germany, state dialogues with minorities have gained central importance as a tool to resolve the disagreements between minority and majority cultures. In both countries, these dialogues were initiated against a similar socio-political background and featured similar attributes. Particularly in the aftermath of 9/11, minority cultures and the challenges they pose to liberal democracies were defined in religious terms, resulting in an increasing ‘Islamization’ of ethnic and cultural identities. This trend also
determined the form and scope of the state-dialogues with minorities, calling governments to establish formal mechanisms to relate to Muslim communities. Britain entered into this dialogical phase much earlier than Germany. State-dialogues with Muslim communities were promoted as part of the ‘multi-faith’ agenda of the New Labour Government (under Tony Blair) which came to power in 1997 and facilitated the establishment of the Muslim Council of Britain (MCB). In 2003, when ‘honour killing’ became a visible policy area in Britain (after the murder of Heshu Yones), the British Government knew exactly who to draw to consultations about these unacceptable ‘cultural practices’: the spokespersons of the MCB and the community leaders in Muslim communities.

In Germany, the situation was slightly different. The state-dialogues with Muslims were developed in response to integration problems of the mostly Turkish minorities living in ‘parallel societies’. These problems became increasingly visible after the murder of Hatun Sürücü in 2005. Although many of the issues Hatun’s murder brought to the fore (such as the oppression of girls and women in Muslim communities) have long been present, addressing them became a top government priority, especially after the passage of the new Immigration Act (Zuwanderungsgesetz) in 2004. With this act, Germany recognized itself for the first time as an immigration country (Einwanderungsland) and decided to resolve once and for all, the long-standing issues pertaining to cultural and religious diversity. In 2006, the Federal Government initiated the first institutionalized dialogues with migrants living in the country, namely the Integration Summit and the German Islam Conference. The issue of ‘honour killing’ came to the fore mainly within the context of the Islam Conference under the topic of gender oppression in Muslim communities.

With respect to the issue of ‘honour killing’, governments in Britain and Germany encouraged different types of actors to speak on behalf of the affected communities within the state-dialogues. In Britain, these dialogues were defined in policy terms as ‘working with communities’ and were carried out mainly with self-appointed, male community and religious leaders. This move of the British government was heavily criticized by feminist counterpublics composed of activist groups and women’s organizations which argued that by preferring to engage with more powerful members of minority communities, the government ignored the voice of women and other powerless sections (Southall Black Sisters 2001:9). They protested government agencies for failing to recognize that self-selected community leaders reflect only a narrow range of predominantly conservative opinion on culturally contested issues.

The German government followed a different path in choosing its interlocutors. Rather than empowering self-selected community leaders, it restricted, guided and constrained the involvement of Muslim representatives in the state-dialogues. On the issue of ‘honour killing’, it encouraged women of Muslim origin with an ‘insider viewpoint’ to act as the representatives of immigrant communities. This brought the claims of selected women with immigrant backgrounds (such as Seyran Ateş and Necla Kelek) to the centre of public attention. The ‘insider’ status of these women was not the only reason for the German government to recognize them as representatives of immigrant communities. Figures such as Ateş and Kelek offered what the ‘hegemonic
listening’ expected to hear about the issue of ‘honour killings’. Both figures have been outspoken critics of Islam. They both blame Islam for the suppression of women in immigrant communities and for practices such as ‘honour killing’ and forced marriage. Their arguments thus helped reinforce culture-based explanations of ‘honour killing’ in Germany.

Although the governments in Britain and Germany empowered different actors as their main interlocutors, there are important parallels between the British and German state-dialogues with affected communities. The absence of legitimation, which could only be achieved through democratically elected representation, was a common feature of the state-dialogues. Moreover, while designing these dialogues, governments in both countries, relied on an essentialist notion of culture and adopted the most reductionist approach to cultural identity. This led to a representation of cultural communities as internally more homogenous than they are and sharpened the boundaries between minority and majority cultures. In sum, state-dialogues with minorities only helped to strengthen the culture-based frames of ‘honour killing’.

In both countries, civil society actors criticized the state-dialogues for failing to reflect the full diversity of views on ‘honour killing’ both within and outside migrant communities. The British government was more responsive than the German government in responding to these criticisms. As a result of the pressure coming from feminist counterpublics, the British government began (especially from 2005) to include other stakeholders, most notably the representatives of women’s organizations, in its policy debates on ‘honour killing’. This went hand in hand with the British government’s move away from the essentialist notion of culture towards the recognition of intracultural diversity (at least in its policy documents and strategy papers). This move was particularly evident in the way government approached the issue of ‘honour killing’. Recent government documents on ‘honour killing’, such as the strategy papers prepared by the Association of Chief Police Officer (ACPO)(2008) and the Home Office (2009), have employed an anti-essentialist understanding of culture. These documents emphasized that culture may be ‘perceived’ differently by members of the same community and attempted in this way to counteract the cultural stigmatization caused by ‘honour killing’ cases.

In contrast to Britain, in Germany the government has continued to operate with an essentialist notion of culture, denying differences within a culture and similarities across cultures. This went hand in hand with an excessive focus on a corporatist approach to representation which forced Muslims to form a unified group with collective interests. The German government did not want to hear mixed messages; it wanted to view minorities as homogenous groups who think along the same lines. This had important implications for the way ‘honour killing’ was debated. By failing to take intracultural diversity seriously in its interactions with affected communities, the German government contributed to the polarization of the ‘honour killing’ debate along cultural and religious lines.

b. Semi-formal institutions

The analysis of the British ‘honour killing’ case reveals that semi-formal
institutions located between formal and informal spheres offer the most promising venue for the interaction of weak and strong publics. One example of such institutions was the Women’s National Council (WNC) in Britain which was established in 1969 and closed down in 2010 by the current coalition government. The WNC was formally a non-departmental public body financed by the UK government and set up to provide independent advice to the state in policy matters concerning women. It represented more than 450 partners including women and women’s organizations in England, Northern Ireland, Scotland and Wales (Donaghy 2007). It played a particularly important role in terms of bringing out the voice of minority women on issues that concern honour-based violence. It initiated a variety of deliberative forums such as the She Who Disputes - *Muslim Women Shape the Debate* which helped to challenge the existing stereotypes about Muslim women ‘as suppressed and unwilling to make their own choices in life’ (She Who Disputes: Muslim Women Shape the Debate 2006:6). As such, the WNC offered for both minority and majority women an important discursive opportunity structure to influence violence against women policies.

Semi-formal institutions such as the WNC were not present in the German case. As noted before, in Germany there was a lack of interaction among women’s organizations and between women’s organizations and state institutions on the issue of ‘honour killing’. In Germany, the main channel of interaction between state and civil society remained the political parties and party affiliated organizations (*Parteinahe Stiftungen*). This institutional structure, together with the strong emphasis on the linkage function of political parties, hindered the possibilities for direct interaction between women’s organizations and formal decision-making circles. Unless such organizations were tied to political parties, their claims remained unheard.

c. Government-sponsored inquires into ‘honour killings’

The third tool which inhabited the area of middle democracy and which was present only in Britain was the government-sponsored enquires related to ‘honour killing’. In July 2007, the House of Commons Home Affairs Select Committee launched an inquiry into issues around violence against women which consisted of a series of consultations with key personnel and survivors, visits to women’s organizations and refuges, oral evidence from expert witnesses and survivors and an online consultation which ran for six weeks from January 2008. This inquiry was influential in changing the terms of the ‘honour killing’ debate in Britain. The final report of this inquiry characterized ‘honour killing’ as gender-based violence and called government to tackle these crimes through the prism of gender (House of Commons 2008).

Most recently in 2009, the British Home Office launched another nation-wide inquiry on violence against women and girls including ‘honour killing’. Entitled *Together We Can End Violence against Women and Girls*, it was run over three months between March and May 2009. The purpose of this consultation was to ‘create a national debate engaging all parts of society in the task of eliminating
violence against women and girls'. Based on the results of this consultation, the British government intended to develop a much awaited comprehensive policy approach to addressing violence against women and girls including ‘honour killing’. As a result of the public consultation in 2009, the Home Office developed cross-government strategy by setting out a range of actions for the police, councils and other government departments working across the areas of prevention, provision and protection. This strategy paper defined ‘honour killing’ under the broader category of violence against women and emphasized the need for government agencies to cooperate with specialist third sector organizations (civil society organizations) operating in the area of violence against women and girls (Home Office 2009:48).

In Germany, there were several government inquires into violence against women, but none of them entailed the issue of ‘honour killing’. These inquires were conducted by the Federal Ministry of Family Affairs, Senior Citizens, Women and Youth (Bundesministerium für Familie, Senioren, Frauen und Jugend) and focused mainly on the issue of forced marriage (see for example, Federal Ministry for Family Affairs 2004; 2009). When seen from a framing perspective, the question of which government agency is given the primary responsibility to inquire into ‘honour killing’ gains particular importance. While the Federal Ministry of Family Affairs, Senior Citizens, Women and Youth saw forced marriage as an issue that clearly falls under its agenda of gender-based violence, it failed to engage with the issue of ‘honour killing’ along these lines. ‘Honour killing’ was seen as an issue that should only concern the government agencies working in the area of immigration and integration, such as the Federal Agency of Migration and Refugees (Bundesamt für Migration und Flüchtlinge). In contrast to Britain, there was no attempt by the government to define ‘honour killing’ within the context of violence against women (VAW) or to consult civil society organizations who had been working on these issues long before they became public concerns. The German government narrowed its field of inquiry and thus precluded the consideration of alternative problem definitions of ‘honour killing’.

d. Interactions with illiberal enclave counterpublics

In neither Britain nor Germany was there was any participatory tool to reach out to defenders of ‘honour killing’, whom I conceptualized as illiberal enclave counterpublics. The repressive discourses of these publics were represented mainly through the media. When seen from a micro-deliberative perspective, which insists on the need for face-to-face interactions with affected groups, we can conclude that neither Britain nor Germany succeeded in providing the conditions for such interaction. However, when seen from a macro-deliberative perspective, which understands inclusion and interaction on discursive terms,

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6 Around 10,000 people were reported to have engaged with the consultation (Home Office 2009).
7 See, for example, the recent press release from this agency, Bundesamt für Migration und Flüchtlinge (2011), which frames ‘honour killing’ in the context of other issues related to immigration and integration in Germany.
8 See Kelemen (2006) for examples of face-to-face dialogues with the defenders of ‘honour killing’ in the Swedish context.
we cannot simply conclude that there was no interaction with illiberal enclave counterpublics. Their discourses were included in the framing contestations over ‘honour killing’ both within and outside decision-making circles. The discursive interactions with the illiberal enclave publics evolved in substantially different ways in Britain and Germany. Whilst the British debate featured the elements of an *agonistic* interaction which was directed towards understanding the motivations behind the practice of ‘honour killing’, in Germany the interactions with the illiberal publics occurred along *antagonistic* lines. Drawing on Chantal Mouffe, the main difference between these two forms of interaction is that an agonistic engagement requires perceiving ‘the other’ not as an ‘enemy’ but as an ‘adversary’, ‘somebody whose ideas we combat but whose right to defend those ideas we do not call into question’ (Mouffe 2000b:126). The British parliamentary debates exemplified the possibilities of an agonistic interaction with the repressive discourses of the illiberal enclave publics.

To conclude, when judged against the criterion of interaction, the British government was more pro-active than the German government in its endeavors to interact with various publics and bring their concerns to the fore. Also, in Britain, the area of ‘middle democracy’ was much broader and richer than in Germany. Whereas in Germany the main tool of interaction between formal and informal spheres was the state-dialogues with minorities, in Britain, in addition to such dialogues, we have also seen the examples of parliamentary committee hearings, nation-wide public consultations and the deliberative processes initiated by semi-formal institutions on the issue of ‘honour killing’. Despite their several shortcomings, these initiatives have provided a more conducive framework for a deliberative treatment of the ‘honour killing’ issue in Britain.

**iii) Approximating the condition of influence**

As discussed before the condition of aims to identify whether the interactions with counterpublics have yielded any concrete outcomes within the decision-making circles.

When checked against this criterion, there are important differences between the British and German debates. These differences become particularly evident when we consider the role of the respective resistant counterpublics in these debates. In Britain, the feminist counterpublics succeeded in transforming the dominant, culture-based problem definitions of ‘honour killing’. The discursive interactions among multiple publics resulted in the transformation of exclusively culture-based frames into gender-based or hybrid frames of ‘honour killing’. The latter defined ‘honour killing’ as an issue located at the intersection of the conflicts of gender and culture. The most recent literature on the British ‘honour killing’ case captures some of these shifts. Rupa Reddy, for example, conceptualizes the new approach to ‘honour killing’ in Britain as a ‘mainstreaming plus’ approach (Reddy 2010). This approach endorses the need for mainstreaming ‘honour killing’ as gender-based violence but also draws attention to culturally specific motivations. A close analysis of government documents on ‘honour killing’ over time shows that as a result of discursive engagements with various counterpublics, the British government began to adopt a predominantly gender-based approach to ‘honour killing’. The impact of
feminist counterpublics in the British ‘honour killing’ debate are visible in the way government framed its inquiries into ‘honour killing’, in the new murder law and in the most recent police strategies (see, for example ACPO 2008).

In Germany, the ‘honour killing’ debates did not result in any concrete outcomes. German politicians debated ‘honour killing’ extensively but they did not produce a coherent set of policies to address the issue (Korteweg and Yurdakul 2010:14). ‘Honour killing’ continued to be framed as a culturally specific form of murder that occurs only in certain cultures. The alternative frames of ‘honour killing’ as represented by the resistant counterpublics remained at the margins. The German debate shows that besides institutional opportunities to participate in public and policy debates, the ‘discursive legacies’ in a given society play an important role in determining which voices claim legitimacy. These legacies ‘define the questions politics should answer, making some seem common sense and others absurdly radical’ (Ferree 2012:4). The gender-based frames of ‘honour killing’ were arguably too radical to resonate with the existing socio-political context in Germany and thus remained at the margins of public and policy debates. Also, as Erik Bleich (2003:32) argues, it seems that for frames to have an influence in public and policy debates, a core group of significant actors must already be operating with them prior to policy negotiations. Obviously, this has not been the case with respect to the gender-based frames of ‘honour killing’ in Germany. The prospects for transformation from culture-based to gender-based frames of ‘honour killing’ seem to be enhanced ‘where there are a range of women’s organizations proposing and testing out a variety of approaches and initiatives, and getting sufficient access to policy circles to contribute to debates’ (Phillips and Saharso 2008:299).

Conclusion

In this paper, I developed the conditions under which the deliberative democratic approach can transform a polarized public debate into pluralized public conversation. I demonstrated the capacity of this expanded deliberative approach by focusing on the ‘honour killing’ debates in Britain and Germany. Although polarization was a common feature of both debates at the beginning, the way the debates developed was very different. Britain saw the transformation of a polarized debate into a pluralized debate. I related this development to the approximation of the deliberative conditions in Britain. Here, the discursive interactions between government agencies and feminist counterpublics and among various counterpublics have led to the emergence of alternative problem definitions of ‘honour killing’, breaking the rigid divide between ‘them’ and ‘us’. In contrast to these developments, in Germany, the issue of ‘honour killing’ has always been framed as a culturally specific type of

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9 In 2009 there was a change in the law of murder in England and Wales; a change that illustrates a move away from culture-based frames of ‘honour killing’. The main change to the law deals with provocation. Previously, people who killed after being proved into losing their self-control could have a ‘defence of provocation’. This is a partial defence, leading to a conviction for manslaughter rather than murder. In 2009 the new Croners and Justice Act replaced the defence of provocation by a new partial defence to be known as ‘loss of self control’. In deciding whether loss of self control had a qualifying trigger, the courts must ignore factors such as sexual infidelity, jealousy or honour as reasons to kill (House of Commons 2009).
murder and debated in polarized terms that intensify the antagonism between minority and majority cultures.
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