

Chapter 1



Why Europe Is Lesbian and Gay Friendly

As a Texan lesbian academic living and working in the United Kingdom for more than 20 years, I am often asked by other Americans why European countries are so much more accepting of their lesbian and gay citizens. Of course, European scholars also direct the other version of this question at me: Why are Americans so against the extension of rights to lesbian and gay citizens? This book is an attempt to provide an answer to the first of these questions. In doing so, the last chapter sketches an answer to the second.

Some answers to this question can be found in relevant literature, and I discuss these briefly here. Although each of these is an acceptable and accurate narrative, my concern here is with a narrative that appears to be missing from that literature and one that has significant potential in framing a Euro-American comparative discussion. Specifically, the narrative in this book explores how a consideration of the political economies of care can bring to light nuances in such a comparative analysis.

A quick survey of contemporary literature offers up four key possible answers to the question posed. The first, most expertly captured in Jeffrey Weeks' book entitled *The World We Have Won*,¹ maintains that from the moment of the Stonewall Riots in New York in 1969 the "gay" movement has made a significant impact on the

cultures, politics, and policies of the Western world. Familiar new social movement literature outlines the importance of key political moments where activists took to the streets demanding change. Likewise, historians and ethnographers compile moving accounts of activists organizing as a community in order to protect individuals from harm, and provide basic care, as the discovery of HIV/AIDS led to homophobic backlash, marginalization and, in some cases, the denial of medical care and welfare. Over time, activists gained experience in engaging with the institutions of the state and became more professionalized in securing voluntary sector/nonprofit financing,² in provision of care and services as well as in the art of political lobbying and rational, elite persuasion. For example, Ricardo Llamas and Fefa Vila note the development of a “homocracy” from two fundamental aspects of Spanish activism: “an establishment of social centers” and “provision of social services around AIDS prevention and information hot lines.”³ It is clear that the “gay movement” matured and, now more inclusive of a range of non-heterosexual identities, has become a more sophisticated political actor in most Western democracies.

With such political professionalism developing in Western democracies, there began to emerge a few moments—brief and sporadic at first—in political discourse in which a few leading politicians or local policymakers would take a political risk by calling into question the traditional notions of equality, justice, or rights—brave attempts to reframe the debate and raise the opportunity for a redefinition that was more inclusive of lesbian and gay citizens. As these moments increased, a second narrative emerged mapping these as indicators of an ideological shift. A few European countries were able to set the bar for good practice in nondiscrimination and inclusivity to which others could aspire. Reflecting on these moments, Kees Waaldijk employs a policy developmental model that outlines how this shift might take place over time within any one country and how this might lead to increased policy sharing.⁴ Others, Kelly Kollman and David Paternotte for example, map the reframing of human rights to include same-sex relationships as a global phenomenon.⁵ This narrative suggesting an ideological shift does have its challengers. The history of modern political theory attests to the difficulty of agreeing on even the most basic values of liberal democracy. Within the lesbian, gay, bisexual, transgender (LGBT) academic community—just as within all philosophical discourse—the reaction to shifting values is often: “Whose justice? Which equality?”⁶ Backlash to inclusivity

in the Social Chapter, for example, continues to mark the European debate where social conservatives from the political right feel threatened by attempts to expand the umbrella of justice or rights to include non-heterosexual citizens. Arguably, for each of these ideological shifts there is a counter-argument against new definitions of justice or equality. This opposition has been significant in each European country—those that are now more “friendly” and those, such as Poland, that continue to be substantially less or unfriendly.

A third explanation points directly to the construction of the European Union (EU) as unique political terrain for introducing social change. To be sure, the construction of the EU did present windows of opportunity in which inclusive policies could be framed as economically beneficial. Developing social policy interventions was justified if the laws of member states were distorting competition or damaging the creation of economic union, for example, by inhibiting the free movement of labor.⁷ Social changes, however, were limited to the lowest common denominator of what was politically feasible and facilitated economic interdependency. The harmonization envisioned in Article 117 was understandable as the six original signatory countries had similar welfare regimes however as member states increased, so did the social values and policy diversity. Despite this diversity or a detailed European blueprint for social protection, what emerged over the following decade—by way of green and white papers on more specific social policy issues, social action programs, and judgments in the European Court of Justice (ECJ)—has been the fleshing out of fundamental values around fair treatment in employment, responsibility for public health, environmental protection, and nondiscrimination.⁸ The driving force behind these incremental articulations of European social values continues to be economic competitiveness.

With regard to lesbian and gay friendliness, this third narrative about opportunities presented in the development of EU economic and social policies must be set against the structural difficulties that seem to undermine the coherent advancement of lesbian- and gay-friendly EU policies. On the one hand, the link between the commitment to economic integration and the need for social policies to facilitate it offers unique possibilities for policy development. For example, institutional conversations about employment, equal consideration under the law, and free movement of workers provide opportunities for discussing discrimination based on sexual orientation without directly confronting specific hostile national constituencies. Beck and

others note the ample opportunities within the European solution to achieving social justice within a capitalist market system.⁹ However, the subsidiary nature of European institutions and the open method of coordination (OMC) leave significant scope for national interpretation. Therefore, although there has been a creation of opportunities to discuss economic inclusion for lesbian and gay citizens, there is no guarantee of agreement on issues of social values, particularly beyond the remit of economic efficiency and competition.¹⁰ Narratives about commitments to harmonization must be balanced with a nuanced appreciation of the diversity of cultural values that may be at odds with the social inclusion of lesbian and gay citizens. Moreover, the expansion of the EU further challenges an assumption of shared social values. To that end, the ideological, historical, and institutional context of the EU serves as only one part of the explanatory narratives about why Europe is lesbian and gay friendly.

A fourth narrative can be found in quantitative data regarding the shift in social attitudes toward gay men and lesbians, or as most often articulated in data sets “homosexuality.” For example, 2007 Pew Research Center Global Attitudes Project found that in Western Europe “clear majorities say homosexuality is a way of life that should be accepted by society.”¹¹ Similarly, longitudinal evidence is detailed in work such as the British Social Attitudes Survey, which found in 1983 that 62% of those surveyed thought homosexuality was always or mostly wrong. However, by 2008 only 36% held this view.¹² This data resonates with similar findings from the United States tracking the shift in attitudes over time. In a *PS* symposium on same-sex marriage, for example, Gary Segura summarizes this literature noting that when “more respondents attribute homosexuality to nature, rather than nurture, opposition to same-sex marriage declines.”¹³ Such attitudinal factors act as a precursor to and a justification for legislative and judicial intervention that supports inclusivity of lesbian and gay citizens. There is increasing evidence, then, suggesting that the advancement of friendly policies may be facilitated by changing social attitudes and that these changes are particularly accommodating in Western Europe.

Each of these possibilities provides a rational narrative that may help one articulate an answer to “Why is Europe lesbian and gay friendly?” Arguably there is more than one answer to the question. It seems most likely that it is the overlapping dynamics of multiple narratives that gives a contextualized picture of what is unique about

some European countries in this particular area of policy development. However, I believe the literature seems to have one significant gap that, when addressed, could offer further explanation regarding the peculiarities of policy changes in Europe and, importantly, shed light on the differences between Western and Eastern European countries as well as addressing the North–South divide. It also goes some way to helping Europeans understand why American may never be lesbian and gay friendly.

Why Friendly?

All encompassing metanarratives have taken much criticism in social science research over the past 20 years, many of which are deserved. Having said that, just because one narrative cannot encapsulate the whole fragmented, fluid tale does not mean that the art of storytelling is fruitless. Stories bring to light characters, roles played, dynamics of power, and offer explanations that hopefully resonate with the experiences of the audience. The narrative constructed here employs a range of literatures in order to highlight particular dynamics that involve characters who are themselves multifaceted and change over time. It is a snapshot of complex events that are not simplistic or static. Nevertheless, it is a narrative that offers some explanation about fundamental differences of political language, political relationships, and why some citizens fare better than others. The analysis focuses on the dynamics of power highlighting those actors who benefit from such power and those who do not. In doing so, it brings some clarity to political debates about normative questions such as: Who should have power and who should benefit from that power? What obligations do individuals have to each other? What obligations does the state have to citizens? What about rights? In considering possible answers, there must be continual interrogation and reflection about the answers offered. For example, much of what follows raises questions about assimilation and integration, about marginalization and inclusion and about which policies are “best.” These are interesting and compelling but are secondary considerations to my current endeavour. Instead, here my gaze moves across a complex political terrain that, when detailed, offers up an explanatory narrative about manifestations of existing power dynamics.

As the question posed to me is normally in the context of policy and legislative change, the answer addresses these topics specifically. In doing so, much of the discussion focuses on aspects of governing and governance but also will touch on, for example, national or cultural explanations. Occasionally and where appropriate, it will include comments regarding the EU and implications of EU membership on national policy and politics. Neither discussions of particular nations nor the EU will assume governing states are monolithic actors. Instead, states are assumed to be varied according to national political culture, legislative remit, and administrative flexibility when engaging with “non-state” actors—recognizing, for example, that such constructed boundaries between “state” and “non-state” shift according to historical moment and political need.

My decision to limit this consideration to “lesbian and gay” is an attempt at accuracy rather than a desire to marginalize other possible identity labels. Policy language usually refers to “sexual orientation,” “same-sex,” or the more archaic “homosexual,” but consistently the intention is to address a perceived hetero–homo binary. Across Europe there is an increasing awareness in policy and political discourse of the needs of transgender citizens but this often is positioned under an umbrella discussion of gender discrimination.¹⁴ Other sexual–political identities certainly have made a mark in the academy and queer/transgressive sociopolitical movements but, for reasons not unrelated to those outlined in this book, policy shifts have yet to offer formal recognition.

I have opted to denote formal recognition as “friendly” for two reasons. First, policy literature, particularly those produced by feminists, use phrases such as “women-friendly policy” or “family-friendly policy” as a means by which to measure changes in policy and subsequent outcomes based on a binary gender rubric.¹⁵ Some employ the spirit of this friendliness to consider possible policies that might lead to, in the words of Joni Lovenduski, a “feminization of politics.”¹⁶ Such criteria considers to what extent a party or particular government (a) acts for women, (b) takes on women’s concerns into policy, and/or (c) makes a difference to women’s lives. Similar labeling can be found in sexualities studies broadly speaking, but these entail a range of research intentions, methodological approaches, and identity-related issues.¹⁷ For the purposes here, *friendly policy* acknowledges an increase in inclusivity and the recognition of specific needs of some lesbian and gay citizens through public policy.

Second, “friendly” is sufficiently fluid as to allow for comparisons and substantive difference. Friendliness may be an empathetic, mutual understanding of different positions and struggles. But it also can describe “Facebook friends” or those who publicly smile and wave without ever really knowing, or caring. Friendly may be slightly better than tolerating, but the depth and extent of the relationship remains unclear and fluid.¹⁸ Friendly policy does not imply depth of individual care or the lack of homophobia. In most European countries and, as detailed later in the United States, there are measureable changes in public attitudes on a range of policies. However, a change in attitudes alone does not explain the growth of policies recognizing the rights of lesbian and gay citizens. Positing the question in these terms does not necessarily imply that I consider policies in Europe, or the United Kingdom, as indicating a lesbian and gay utopia, but it does acknowledge some significant shifts away from, for example, criminalization.

Finally, even if one is perceived to be “friendly” that does not imply the sentiment is mutual. Some LGBT citizens are not satisfied with current rhetoric in policy and politics debates regarding constructions of sexual desire and identity categories. Most are all too aware of the extensive reach of the normative hand of the state in individual lives. Some see the expansion of policies, such as same-sex marriage, as more inclusive, whereas for others such expansion invokes caution. Carl Stychin, for example, worries about the potential complacency or conservatism that may result from a law that includes gay men and lesbians but continues to normalize. Normalization can lead to political complacency. “Same-sex sexual communities,” and I would add political science academics, “must themselves continue to be interrogated for their own exclusion and marginalizations (such as around race, gender, and social class).”¹⁹ There is a tension in LGBT scholarship between those who are comfortable with such interrogation, those who are not, and those who believe it to be the end in itself. Outside the academy, there are plenty of LGBTs who advocate “friendly” policies because they share in the values the policies articulate or just because it makes their lives more liveable. Other LGBTs disagree with, or are hostile to, such policies because they question the right of the state to limit transgressive behaviors or identities. In this investigation of friendly policies, I focus on the ways in which policies can make practical changes that makes some lives better, more liveable, while keeping a keen appreciation for caution and continual interrogation of assimilationist normativity.

Constructing a Narrative

In constructing a narrative about the political economy of care, I bring together pieces of an academic puzzle that normally remained fragmented by disciplinary boundaries or diverse research trajectories. For example, in social and public policy there is proliferation of European comparative literature regarding religion, secularization, demographics, policy particulars, and welfare states. I have used various pieces of this comparative literature to inform my account here. Similarly, accounts of, to borrow a phrase from Anthony Giddens, *The Transformation of Intimacy*, or from Kath Weston, *Families We Choose*, or from a range research in the emerging field of “sexualities studies” offer compelling sociological insights about shifting understandings of family. Some of these appear to buttress my account. Finally, underpinning much of my analytical position is a feminism that consistently questions gender and family configurations, particularly unpicking the role of care in social and political relations. In weaving together a story that draws upon interdisciplinary research, undoubtedly I have overlooked a few particularities within arguments. Despite that loss, the narrative here attempts to negotiate complexity and fluidity sufficiently to locate an explanation of current lesbian- and gay-friendly policy in Europe.

This approach is inspired by Spike Peterson reflections on framing. Her research considered “three interacting, overlapping and co-existing economies—reproductive, productive, and virtual” (RPV) as a nuanced and indeed “‘realistic’ framing for the study of political economy.” Although I do not use her RPV framing specifically, I find her motivation for this approach academically compelling as it attempts to “shift our thinking away from the monological/positivist and narrow disciplinary orientations” and “rejects the separation of culture from economy, economics for politics, agent from structure or domestic from international politics”²⁰ For Peterson, “framing is cross-disciplinary, multi-institutional, multi-level and multi-causal”; it is a “mapping technique” “directing our attention to more features of globalization and illuminates linkages and relationships across an expanded terrain.”²¹ In considering aspects of the American welfare system, Anna Marie Smith has advocated a similar multisectoral approach to political analysis.²² Both Peterson’s work and Smith’s reflections have motivated the incorporation of various frames in this work as an attempt to acknowledge complexity, to map power relationships and to build strategic knowledge. Primarily, this piece brings together analytical frames at work across subfields of the discipline

of politics, including comparative public policy, political economy, feminist theory/politics, and religion and politics.

Therefore, in answering the question posed, I make comparisons between European countries and between European countries and the United States. The comparisons offered here are not cross-country comparisons examining the particularities of policies. Most policy analysts acknowledge the difficulties of constructing such specific comparisons that fully capture the country-specific differences. In borrowing Peterson's framing approach, this work illuminates resonances across policy areas while explaining policy dissonance with sensitivity to national differences of politics and culture. This broad-brush approach is familiar to European comparative studies because, as Daly notes, "the comparative canvas is very large."²³ In *Gender and the Welfare State*, Daly and Rake make a case for moving beyond the direct comparison of normative policy to consider the "complexity" of welfare as an "active site and source of adjudicating particular claims."²⁴ One familiar route through the complexity of comparative work is the construction of "typologies." Developing helpful typologies to investigate exclusion has become a key method to understanding the positioning of women, racial and ethnic minority populations, as well as lesbian and gay citizens. For example, as mentioned, Waaldijk and Clapham's collection, *Homosexuality: A European Community Issue*, offers comparisons to outline the possible impact of EU on policy development.²⁵ Bejer likewise finds typologies helpful in working through the *Tensions in the Struggle for Sexual Minority Rights in Europe*.²⁶ Each of these tries to move beyond the rudimentary comparisons of data toward a typology that offers explanation as to why particularities and similarities exist. Examining this traditional approach does open up some lines of inquiry and facilitates, as noted in Chapter 5, a reconfiguring of comparative clusters based on similarities regarding how commitments to citizens' faring well and the resulting political economy of care help map power negotiations that facilitated the expansion of "friendly" policies.

Much of the comparative literature focuses on European "welfare states." This phrase is imbued with various meanings but generally it is employed to refer to the methods and means by which Western democracies guarantee or provide services to those deemed, by a range of criteria, "in need." As detailed in Chapter 2, the ways in which European states have governed welfare delivery has changed significantly over the past 50 years. Given these changes, I am less sure that the term *welfare state* remains an accurate description, so I try to avoid it

here. European countries can be described more accurately as relying on a “mixed economy of welfare.” This term reflects the mixed and fragmented nature of welfare provision in different countries, including the possible range of providers such as the state, family, private sector, and voluntary/faith-based sector. Additionally, the linguistic emphasis on the dynamics of the economy contextualizes an explanation of policies that now might be considered under a general umbrella of “welfare”—for example, those understood as “family policies.”

Moreover, the invocation of the dynamic of the economy—in the cases considered here, a capitalist economy—highlights the way in which welfare, or the state’s duty to ensure citizen’s can fare well, is itself a commodity. Esping-Andersen described the way in which capitalism turns all aspects of life into “commodities” that can be packaged, bought, and sold (e.g., health, education leisure, and how people’s access to these goods depends on their ability to pay for or buy them).²⁷ Finally, the term *mixed economy* does not necessarily rely on a construction of the state as a monolithic actor. Instead it can provide space for an anti-essentialist perspective of “the state”—a recognition of the fluidity of movement, particularly of elites, inside and outside the bureaucratic apparatus of governing. As the dynamics embodied in “a mixed economy of welfare” sit at the heart of this particular narrative, more detailed discussions follow in other chapters.

Finally, the term *welfare capitalism*—the relationship between capitalism and the emergence of state welfare interventions—has a rich and deep history in post-World War II European countries. I sketch some of that history in the chapters that follow, noting specifically how that history engendered a commitment on behalf of many European nation-states to ensure that citizens fare well. This tradition has changed significantly to a mixed economy where there is explicit recognition of the various actors involved in care provision as well as the political and cultural power of each. So in order to broaden the familiar comparative frameworks of welfare-capitalism or the mixed economy of welfare, I focus discussion on the various providers of care.

What Does It Mean To Care?

In her ground-breaking book, *Moral Boundaries*, Joan Tronto argues that:

Caring is a species activity that includes everything that we do to maintain, continue and repair our “world” so that we can live in it as well as possible. That world includes our bodies, our selves, and our environment, all of which we seek to interweave in a complex, life-sustaining web. . . . The practice of care describes the qualities necessary for democratic citizens to live together well in a pluralistic society . . . [care makes] citizens more thoughtful, more attentive to the needs of others and therefore better democratic citizens. . . . Care is a central concern of human life.²⁸

Tronto outlines the virtues of care as attentiveness, responsibility, competence, and responsiveness.²⁹ Across the social sciences, others have conceptualized care in various ways: Leira understands care as “loving, thinking and doing”³⁰; Gilligan originally claimed a “different moral voice” of those, primarily women, that provided care³¹; Thomas outlines seven dimensions of care: identity of providers/recipients, relationship between them, economic characteristics of relationship, labor of care, social content of care, social and institutional setting of care.³² These, however, focus on the interpersonal or psychological aspects of care. Echoing Tronto, Bubeck emphasizes the need to link social justice and care: “care is a deeply human practice and certainly more basic than production, exchange or contracting, or engaging in one’s life projects: in suitable conditions, humans can exist without any of these. . . .”³³ Similarly, my concern here is the role care plays at the foundations of our political and economic life.

Tronto asserts that care is a central concern of human life and then argues that an ethic of care would provide better conceptual foundation for political ideology than, for example, an ethic of justice. Tronto’s work challenges the prioritizing of justice within liberal political theory and offers a different approach to thinking about citizens in a democracy. Likewise for Held, the ethics of care challenges liberal individualism and focuses on the relationality of citizens.³⁴ Although similar theoretical questions are beyond the confines of the narrative of this book, I share their assertion that care as a central element of human life—at some point we all need to be cared for and may find ourselves providing care directly or indirectly—and investigate how recent political and economic dynamics of care provision have opened up possibilities for lesbian-and gay-friendly policies

in many European countries. Care is a central concern of political and economic life and the inspiration for this approach comes from my readings of work by Mary Daly and her co-authors Jane Lewis and Katherine Rake. These works make a strong case for employing care as a tool of analysis, specifically to consider the political economy of care as offering an alternative perspective to comparative welfare policy discussions. The political economy of care, according to their work, refers to “how care as an activity is shaped by and in turn shapes social economic and political processes” where care as an activity sits at the “intersection of state, market and family (and voluntary sector) relations.”³⁵

Feminists have led the charge in developing care as an analytical lens. Feminist policy literature has asked critical questions regarding, for example, the public and private; the domestic division of labor; the gendered nature of both public and domestic caregiving.³⁶ Such academic insights have opened the door for informed policy debates in areas such as gender mainstreaming. However, to my eye, this deployment of care is limited in focus. Taking gender as the determining factor in care analysis has mired much of the literature at the intersection of binary constructions of gender and, in particular, heterosexual negotiations of care. For example, Yeates calls attention to paid and unpaid labor: “it is this insistence on care as labour, the strong connections between productive and reproductive labour and gendered social relations of welfare that have particular resonance of political economy analyses of the welfare state.”³⁷ I agree. But that is not the end of the story, or the only story. This is only one example of many in which mainstream feminism—of either the liberal or more socialist varieties—equates questions of care with questions about gender relations.³⁸ Undoubtedly it is, and given the predominance of heterosexuality, it is unsurprising that this is the focus of the majority of academic work. However, here I want to think outside that particular box.

Again taking Daly’s work as a starting point, I want to further develop the potential of a care analysis. Care, for Daly, is a “policy good with two core sets of interests: those of the person experiencing the set of needs embodied in care and the actor(s) who seeks or is assigned to satisfy those needs.”³⁹ Intervention by the state is “precarious” because of the amount and variety of care needs and the difficulty in ensuring appropriate responses public policies will “connect in fundamental ways with values and norms and the organization

of society” and in considering the “likely implications of a range of provisions” different policy options will have “different strengths and weaknesses.”⁴⁰ However, state welfare policies are not the full extent of care. Daly and Rake explain: “while the state may provide supports and services and regulate the conditions under which care is undertaken in the public realm” most care is provided informally in families and communities.⁴¹ When states intervene in care provision, Daly observes, “They are altering the division of labour, cost and responsibility among the state, market, voluntary/non-profit sector and family.”⁴² Considering the various aspects of the political economy of care facilitates a better understanding of how such state intervention into the dynamic of care alters the investment of other care providers. Given the normative power of the state, such interventions “influence the meaning and composition of different roles.”⁴³ Employing the lens of the political economy of care takes the gaze beyond considerations of welfare and family policy in order to see that “the concept of social care is not exhausted by its utility for a gender-focused analysis.”⁴⁴

Moreover, such an approach enables a consideration of the trajectories of change and the interrelations of the actors, or investors, in the provision of care. Daly and Lewis observe that “if care is becoming increasingly problematic given that the demand for it is growing at a time when the supply is diminishing, welfare states play a crucial role in mediating the dilemmas just as care creates new dilemmas for welfare states.”⁴⁵ So at least one of the benefits of this approach is that it sets state interventions in a wider context of care as a central human need and the variety of ways in which that need can be fulfilled. An analysis of the political economy of care has the potential to widen the research gaze to include the multitude of ways in which various investors negotiate care and the power dynamics of this negotiation beyond just the familiar rubrics of the welfare state and the division of labor in the heterosexual family. For example, considering the political economy of care enables an understanding of the transgressive potential of the state to redefine aspects of care, such as the family, when necessary to meet other political or economic goals. It sheds light on the potential to capitalize politically on the way in which the needs of welfare force the state to construct alternative settings for care (e.g., children’s care, elderly care, hospitals/hospices, housing shelters, etc.) and to recognize alternative sources for care (e.g., voluntary/faith-based sector as well as non-heterosexual families).

Striking a balance between skepticism of normativity and optimism of transgressive potential is important. This is evident in not only mainstream feminist literature but also in lesbian and gay critiques of traditional family policy. Diane Richardson argues that the “normal” citizen is constituted by the state as heterosexual and that heterosexuality serves as a basis for full citizenship.⁴⁶ Her cautionary tale about “desiring sameness” rests on a recognition of variety and difference and a lament that social rights may be extended only to those lesbians and gay men fitting a norm.⁴⁷ Richardson offers a much-needed reminder that a victory for some is not a victory for all. Her warning about the potential for heterosexual normativity within social policy is echoed in much of the debate over same-sex marriage literature that warns against assimilationism or “virtual normalcy.”⁴⁸ At the same time, the empirical studies produced by Weston⁴⁹ and Weeks, Heaphy, and Donovan⁵⁰ detail the variety of networks of care that define the lives of lesbians and gay men. Expanding the definition of “family” provides real economic and social benefits for some gay and lesbian citizens (and their children) and in doing so goes some way to disrupt the heterosexual monopoly on family policy.⁵¹ There is a complexity within the literature regarding the extension of “family policy” to include lesbians and gay men.⁵² Although it is important to acknowledge the complexity of the analysis and possible political motivations, most would agree that such policy extensions are, on some level, a recognition of networks of care. As Daly and Lewis note that the potential of an analysis of the political economy of care is in “its capacity to capture trajectories of change in contemporary welfare states” in considering various investors in care one can see the “state assumes a central role but shares the limelight as (just) one agent of change.”⁵³ There are other agents of change, and many resisting change. The narrative here attempts to capture that complexity as it manifests itself in the dynamics of care provision.

Who Cares?

Inspired by Peterson’s and Smith’s approaches, the narrative here employs a multisectoral frame to consider the political economy of care in order to answer the question “Why is Europe lesbian and gay friendly?” The answer hinges on determining who cares: Who exactly is providing care, and what investment do some have in maintaining the current supply of care or what investment do others have in

becoming care providers recognized by the state? Care is provided by a combination of sources: the self, family, state and voluntary/faith-based sector. When one of these cannot supply care, others will need to do so, and in each particular scenario, there are consequences: for distribution of power; for gender normativity; for economic activity; and for the privilege of some over others. In many European countries there was a perfect storm: a moment of history where various elements of care provision interacted in such a way in enough places at the same time as to open the door to the possibility of redefining possible sources of care; a moment of thinking outside the care box that led to the most significant shift in care policy, and family policy, and citizenship, and inclusion, in contemporary history. This subsequent configuration of care established a discursive context that began to change hearts and minds just enough for people to see beyond the boundaries of heteronormativity and understand, in the words of Joan Tronto, that “care is a central concern of human life.”

The next chapter focuses on the shared values that underpin welfare in Europe based on: the post-World War II consensus; the subsequent restructuring of welfare due to the demands of economic efficiency; and the relationship between economic interdependency and welfare policies. The final section opens discussion about the social inclusion of lesbian and gay men by considering policy advances and limitations within the rubric of the EU. The aim of the chapter is to map a genealogy of a consensus about the value of welfare to Europeans.

In Chapter 3, I continue this consideration of welfare values, picking up specifically on the relationship between Christianity and welfare provision in Europe. First, I consider European secularization and explore Norris and Inglehart’s claim that secularization is largely a security issue. Next, I look at the way in which Christian values inform welfare provision, for example, through the role of the faith-based/voluntary sector. This consideration includes an examination of the way in which faith-based/voluntary agencies are large providers of care across Europe and the ways in which Christian values have been a driving force in determining state-based care provision. Finally, I employ this literature as another element of an overlapping, multi-sectoral frame that enables comparisons of lesbian and gay friendly policies across some European countries.

Chapter 4 turns to a particular aspect of the contemporary political economy of care: “a care crunch.” The term *crunch* focuses on the

complexity of the ongoing management of the mixed-economy model alongside significant demographic and cultural changes. My intention is to demonstrate how the political economy of care interweaves a commitment to care with Christian care values. I accomplish this by highlighting another institutional source of care: the heterosexual family. The first section focuses on how the political economy of care has rested on heteronormativity. States rely on the heterosexual nuclear family as the primary source of care and, due to demographic and cultural shifts, this monolithic model of family no longer reflects the variety of intimate sources of care. Changing family relations have exposed the risk for relying on one family model for care and subsequently begins to explain why some European states are reinterpreting definitions of family in order to expand and access potential reservoirs of care. In short, European countries have a commitment to care, and in order to fulfil that commitment some have become more reliant on faith-based voluntary agencies, others have begun to reconfigure the working definition of family in order to extend the number of citizens who can potentially care for one another without recourse to the state. This contemporary dynamic of welfare-capitalism's political economy of care has created opportunities for lesbian-and gay-friendly policies in many European countries. The second section briefly considers the dynamics of specific political economies of care in a few countries. Of course, each case reflects political histories and normative cultural values. Nevertheless, we can locate similarities in each that contextualize the emergence of lesbian- and gay-friendly policies.

The penultimate chapter brings into the analytical frame the dynamics of citizenship. As a fundamental element of democracy, theories of citizenship attempt to describe the relationship between individuals and their collective representatives, broadly defined as "the state." If the state has a role to ensure that citizens can fare well, then one key step of that process is to clarify the lawful beneficiaries of social care policies. In the words of Bryan Turner: "who gets citizenship clearly indicates the prevailing formal criteria of inclusion/exclusion within a political community and how these resources following citizenship membership are allocated and administered largely determines the economic fate of individuals and families."⁵⁴ Who counts as citizens matters: It matters because the state bestows political and economic benefits to citizens.

This chapter contextualizes the extension of lesbian- and gay-friendly policies within a political economy of care, which became

increasingly reliant on active citizens. Although caring has not always been recognized as a “public service” or a “civic virtue,” arguably one of the outcomes of feminism has been to highlight the importance, economically and socially, of those providing care. It may be private, unpaid, altruistic, familial, and beyond the gaze of the state but individuals who provide care are, at least in a welfare capitalist system, providing a service to the larger community and the state. Regardless of one’s motivation—values, altruism, or obligation—the outcome of such care is that it lessens the state’s responsibility to vulnerable citizens and subsequent financial burden. The linguistic shift to active citizenship gave a new “speakability” to the care taking place in non-heterosexual “kinship networks” and “same-sex intimacies.”⁵⁵

Toward the end of *Rethinking Citizenship*, Roche writes that in recognizing the context of global economies, regional and world citizenships, and “post-industrial and post-national dynamics,” the “political and moral complexity of social citizenship” needs to be better understood.⁵⁶ A similar sentiment can be seen motivating recent works by Robert Putnam regarding the extent and context of American voluntarism.⁵⁷ A better understanding of the political and moral complexity of social citizenship in Europe, particularly Western Europe, and in America is one outcome of my explanation of why Europe is lesbian and gay friendly. Having mapped key aspects of policy developments in European countries, the final chapter turns to the American context. The narrative does not rely on the increasing literature on judicial rulings, voting patterns on lesbian and gay issues, nor on the rights-based discourse that defines political strategies. Instead, in keeping with the academic terrain of this investigation, I consider what an analysis of the political economy of care, for example the characteristics of social citizenship as manifested in faith-based agencies providing care, can tell us about the hostility toward recognizing lesbian and gay care relationships.

The conservative backlash against Roosevelt’s New Deal and the rise of the Christian right and rhetoric regarding the family led to strictly defined, regulated, and controlled welfare policies toward “the family.”⁵⁸ The Christian social conservative financial and ideological investment in care provision and regulation has particular consequences for lesbian and gay politics and policy. I argue, much to my own disappointment, that the United States will never be lesbian and gay friendly, at least not for the same reasons as some European countries are. Lessons from both the civil rights movement and the

women's movement confirm that rights granted by the courts do little to shift the allegiances of those invested in institutional, socio-economic, and cultural hierarchies. When the federal or state courts force an issue of inclusion, at best it leaves a disgruntled minority, and at worst, there emerges a forceful backlash.

In brief, if care is a central element of human life then, over time, and in myriad ways, a variety of people are going to be involved in providing any individual with care. In that dynamic, where care is a steady demand any range of possible providers might seek to supply that care: oneself, family members, friends, civil society, voluntary sector, private business, or the state. In some European countries, the political economy of this care engendered a more lesbian- and gay-friendly space for citizens, whereas in the United States, the political economy of care continues to foster divisions where "homosexuality" is employed as a political and cultural wedge issue by those invested in faith-based, and faith-defined, care provision. The detailed consideration of various aspects of the political economy of care in Europe serves to highlight why Europe is lesbian and gay friendly. In coming to understand those details, one can then have a more nuanced narrative about why America is not, and may never be, similarly friendly.