UNIVERSITY OF HULL

Marginalization and Identity: The Case of the Bulgarian Face-Veil Ban

being a thesis submitted in fulfilment of the requirements for the degree of Doctor of Philosophy in the University of Hull

by

Maya Vachkova, LLM, MA
March 2021

Acknowledgements

Abstract

This thesis investigates the face-veiling ban in Bulgaria. The data were collected via semi-structured discussions with participants coming from all the main Muslim minorities in Bulgaria. Respondents were asked about their attitudes to the face-veil as well as the ban. An innovative approach to data analysis was employed.

The research found four positions on the face-veil ban: two of in favour of the ban and two against. The four positions make sense as *interacting parts of a system of marginalization and identity formation.* While this system had origins in the political debates leading up to the face-veil ban (indeed, those debates tapped into centuries of prior history), it came into full form when the ban was passed into law; i.e., the legal intervention was pivotal in formalising the marginalization and cementing it in place. It transpires that systems of marginalization and identity formation can arise from legal interventions that 'profanitize' people and behaviours.

The research yields three insights. First, it brings to light the importance of legislation to processes of marginalization and identity formation.

Second, the evolution of legal processes is examined in light of 'sacred' and 'profane' legal categories, thus extending marginalization theory: the evolution of the legislation is mapped, and it is concluded that an initially marginal political player, the Nationalist Party, gained an electoral advantage by portraying face-veiled Muslims as profane. They thereby moved from the margins to the centre of the political landscape.

The third insight is that, despite having a binary (marginal versus central) at the core of its logic, marginalization is not uniformly experienced, expressed and legislated for: the impacts of forms of marginalization can be viewed as lying on a spectrum.

Contributions have been made to understanding the impacts of banning the face-veil, as well as to the systems theories of identity and marginalization.

Contents

This contents page is automated based on your heading styles. It will bring in the heading and page number of any content using the *Heading 1, Heading 2* or *Heading 3* styles. To update the table, you need to right click on this table and choose update field.

List of Figures

This list of figures is automated based on your use of captions (found in the references ribbon). It will bring in any caption that uses the 'Figure' label. To update the list above, you need to right click on this list and choose update field.

This page can be deleted if you have no figures.

Chapter 1 : Introduction

The present doctoral thesis aims to examine and evaluate the face-veiling legislation in Bulgaria and its effect on Muslim identities. In the following pages, I plan to illuminate the historic and political processes that led to the banning of the veil. I will analyse the justification of the legislation and its official moral grounding, as presented by the State. Later in the thesis, I will evaluate how this legal intervention and its moral justification impact upon Muslims. To aid my research, I will use approaches from soft and critical systems thinking: more particularly, soft systems methodology (e.g., Checkland and Poulter, 2006), boundary critique (e.g., Midgley et al, 1998) and the theory of marginalization (Midgley, 1992). My systemic reflections will also rely on institutional theory (Douglas, 1966, 1970). My goal is to reflect on the systemic relationships associated with identity formation, and my hope is that this work may be useful for future public policy and legislation decisions.

A reflection on personal motivations

It is the systemic analysis that I would like to foreground in my thesis; but, as is common in systems research (e.g., Gregory, 1992, 1994, 2000; Midgley, 1995), it is also important to acknowledge that I have *actively created* the systemic analysis though personal engagements with data and theory, so my perspective going into the research is relevant, and is thus acknowledged in this paragraph. Long before my PhD had started, I had a keen interest in the marginalization of Muslim minorities across Europe. In Bulgaria, I had worked with refugees and asylum-seekers, where I heard first-hand accounts of racism, discrimination and Islamophobia. As I chose to marry a Muslim man, I had my own personal experiences of marginalization: my network of friends and family did not easily accept my choice of partner, and neither did his. This reaction was somewhat expected, as we both knew that Muslims and non-Muslims did not often form friendships, let alone marry each other. When I went to university, I had no

Muslim colleagues, and I have never seen a Muslim doctor, architect, lawyer, dentist, or any other of the regulated, socially esteemed professions in Bulgaria. Now, after completing an MA in peace studies and upon writing up my PhD in systems thinking, I know that what I witnessed was a symptom of systemic marginalization.

After moving to England, I continued my work with refugees by supporting the British Red Cross with casework (my first degree was in Law), and then I heard even more stories of persecution on ethnic, religious and other collective-identity grounds. My interest in marginalization and identity-motivated hatred is what initially inspired me to work with refugees. They are sufferers of marginalization, both in their country of origin, and their country of asylum. I have often wondered, if the political actors, the strong of the day, were the ones who steered marginalization and the ones who somehow benefited from dividing the population, how did the rest of the people feel when marginalization was being socially cemented into place?

Empirical focus

The empirical focus of my study is Bulgaria, a post-socialist country with the largest autochthonous Muslim population in the European Union. When I was starting my research, the country was designing a set of counter-extremism policies, and some are already being implemented (Novini.bg, 2020). The chain of events that inspired the ban of face-veiling started in 2014, when a group of Muslim converts was brought under investigation for collaborating with transnational terrorist movements (Hristov et al, 2014). This criminal case triggered a set of policy measures, some of which were already being lined up for implementation, and some of which were new. Amongst the actions taken post-2014 is a strategy, similar to 'Prevent' in the UK with regard to its emphasis on counter-terrorism work in schools, but dissimilar from the legislation in the UK in that it requires an increased police and military presence in Muslim areas, new security forces and also a ban on face-veiling (Dennews, 2014; Dnesbg, 2017).

The 2014 counter-terrorism case against the Muslim converts stimulated a multi-sided dialogue on radicalisation and counter-radicalisation, on native and foreign spiritual practices, on marginalization and its effects - reflected in the media, but also in lay discourse.

At the time I started my research (mid-2016), the debate in Bulgaria was in full swing, and it presented a wonderful opportunity to explore issues of identity management in the context of counter-extremism. The potential of this research stemmed from the fact that policy was in an embryonic state – the government was still thinking about how to address extremism, and the face-veil ban had just been adopted at the end of 2016. Even now, at the time of writing (four years later, in 2020), new policy initiatives are still in the process of formation, so there are opportunities for influence going forward.

Back in 2016, the reaction of the authorities was in its early stages, and so was the reaction of the country's citizens, as new policies emerged alongside heated media debates (Stoilova, 2016a). There was so much heat and conflict because of what was believed to have been happening in Muslim enclaves, where people seemed to have been developing an alternative form of governance, potentially threatening the 'traditional' Bulgarian national identity, represented by the Bulgarian authorities and other religious (primarily Christian) institutions.

According to law enforcement and intelligence experts, some Muslim convert communities in the towns of Pazardjik, Plovdiv, Nova Zagora and Asenovgrad were being closely monitored (Trud, 2016; Stoilova, 2016a, 2016b). In these regions, groups of Muslims had demonstrated symbolic affiliation with the Islamic State by wearing their flag and hanging it on buildings (ibid). Moreover, a local imam and his closest circle were arrested in 2014 after allegedly calling for jihad on non-Muslim Bulgarians. In addition, the Special Forces confiscated jihadi literature, computers and small marketing items, such as IS-branded lighters (Hristov et al, 2014). The authorities assumed that the suspects were sheltering terrorist fighters on their way to Syria and Iraq (Kozhuharov, 2014). Suspected jihadi recruiters were arrested in Pazardzhik too. Following these arrests, a new division of the Special Forces was created to monitor and prevent terrorist attacks.

This was accompanied by the very first Bulgarian Prevent strategy (SANS, 2015; Bulgarian Parliament, 2015).

At the time my research commenced in late 2016, criminal investigations were still on-going. In 2019, Ahmed Musa (the imam of the mosque mentioned above) and his followers were found guilty of preaching religious hatred and anti-democratic ideology. Musa himself was convicted and sentenced to 4 years in prison, and 13 of his closest followers (12 men and one woman) were sentenced to a year in prison each (Ilkov, 2019). They were then charged with, and found guilty of, a subsequent offence of popularising the ideas of the terrorist organisation, Islamic State. Both verdicts followed from Article 108 of the Bulgarian Penal Code, which was originally passed into law to counter the preaching of fascism and similar antidemocratic ideas. Musa was convicted and sentenced to 8 years on this second charge, while his followers, some of whom were also members of the Muslim clergy, were given sentences varying between 1 and 4 years (Petrova, 2019).

The public debates surrounding these 13 men and one woman quickly subsided and morphed into a new debate surrounding the Muslim women who also inhabit the same enclaves. The new topic of intense debate was the face-veiling of Muslim women, both in Bulgaria and internationally, and its acceptability (or not) in the Bulgarian context (Club Z, 2016).

When it comes to the veil, there appears to be a conflict of political and religious perspectives, informed by different values – so in reality, it is a value conflict presented as a political and religious one. At one end of the spectrum, there are people who do not condone the face-veil; and at the other end there are those who either believe it is acceptable or welcome it. Representatives of the former are some key political players, such as the Chief Prosecutor (Dimitrova, 2016); Meglena Kouneva, the Minister of Education (Topnovini, 2016); and prominent members of nationalist parties, like Iskren Vesselinov, Volen Siderov and Valeri Simeonov. On the side of those saying that face-veiling is acceptable, there are politicians opposing the ban – primarily representatives of the predominantly Turkish and Roma party, DPS (which translates to the 'Movement for Rights and Freedoms'). The members of DPS walked out of the parliamentary hearing of the face-veiling

bill to protest against it (Pancheva, 2016). Some human rights activists, like Krassimir Kanev, have opposed the ban too (Focus, 2016a).

The Bulgarian face-veiling legislation is a symbolic act of the State, as it takes one of the positions in the debate: women are now restricted from wearing the veil. This legislation is similar to that introduced in other European countries, like France, where veiled women were not consulted at any point in the policy design (Amiraux, 2013; 2016)[1].

In essence, the ban in Bulgaria represents an *intervention into the identity* of certain groups of citizens who are seen as dangerous. Intervention in this instance is an action aimed at change. *Systemic intervention*, my chosen research approach (originally proposed by Midgley, 2000, 2015, and introduced in full later in the thesis), proposes that, for an intervention to be regarded as systemic, it must be grounded in a meaningful reflection on boundary judgements (i.e., considering alternative possible boundaries for what should be included in or excluded from analysis, and reflecting on the value judgements that drive the setting and critique of boundaries). It would therefore be possible to inquire whether the ban should be regarded as a systemic or a non-systemic intervention. As part of this inquiry, I intend to review the rules for passing legislation that are codified in the Bulgarian legislative procedure, as well as the official accounts and reports of the passage of this particular ban. These rules, accounts and reports should give a good indication of the *official view* of the systemic reflection (or lack of it) that was involved in deciding to pass the ban into law.

The research project I have undertaken, and report on in this thesis, then goes on to undertake a broader systemic analysis of the face-veil ban, viewing it as *an intervention that needs to be subject to critical-systemic inquiry*. I recruited a wide range of participants from the Muslim community, both secular and pious,

---

[1] These bans on the face veil arguably constitute a legal collision with national and EU meta-rules on human rights (Van der Schyff, G. & Overbeeke, A., 2011). Contestation of the French ban has even reached the European Court of Human Rights, which upheld the ban – a decision which generated jurisprudential critique (Heider, 2012).

to investigate their understandings and evaluations of the legislation. I looked at processes of identity formation and change, using the example of the Bulgarian face-veil ban as a case-vignette of how State-led interventions into identity affect how people see their own identities and the identities of others.

The context

Bulgaria is a young, multi-ethnic democracy undergoing a transition into an open, market-led economy after 45 years of Communist rule. It left the protection of the Soviet Union in 1989; and in 1991, the first fully-democratic elections were held. As part of what was called the 'Second World' in the mid-20th Century, Bulgaria made no exception when it came to abnegating religious freedoms: all temples and spiritual institutions of every religion suffered various pressures under political centralisation and the expropriation of resources and power (Todorova, 2013). Although not explicitly *outlawing* religion, the dictatorial regime treated religious institutions as potential ideological opponents, so they kept them subjugated in different, subtle ways – for example, the dubious trial and imprisonment of leading Christian and Muslim clergy was followed by the imposition of political appointees to religious leadership roles.

After the Communist regime collapsed in 1989, a new Constitution was agreed, where citizens were granted various rights in tune with democratic principles, such as the right to vote, the right to self-determination, and the right to religious and political freedom (Bulgarian Constitution, 1991). The new political paradigm of openness also left the door ajar to foreign ideas, literature and knowledge, alongside a multitude of spiritual currents coming from the Abrahamic, Buddhist and Hindu traditions (Hristova, 2006). Indeed, the first decade of the economic transition brought a resurgence of spirituality and a sense of the celebration of difference and religious pluralism (ibid).

However, face-veiling, a Muslim spiritual practice, is now illegal in Bulgaria (Focus, 2016). The initiative to make it illegal commenced with political campaigns in 2014.

First, the face-veil was banned by local governments (Trud, 2016; Standart, 2016). Since 2015, many Bulgarian municipalities have outlawed wearing of the full-Islamic female dress in public spaces, and the police are instructed to arrest citizens and remove their face veils (Mediapool, 2016). Following many local legislative acts in 2016, the face-veil ban then became part of the national penal legislation (Focus, 2016). These restrictions are by no means revolutionary for Europe but are in tune with similar legislation previously championed and implemented in France, Belgium and Switzerland (Pei, 2012).

Modern Bulgarian democracy harbours a fundamental contradiction at its core. On the one hand, it cherishes the right to freedom of belief, self-determination and expression – a set of rights that was severely restricted during the dictatorial regime (1945-89). On the other hand, the Bulgarian constitutional democracy insists that citizens should confine a certain non-violent expression of just one religion to the private sphere.

The rationale behind such legislation is the growing fear of home-grown extremism. The threat posed by home-grown European Islamist radicals seemed to be at the forefront of public debates all through my research, at least until March 2020, when covid-19 became a more pressing threat. Now, in June 2020, there are signs of the resurgence of worries about terrorism as the acute phase of the covid-19 crisis starts to ease.

Since Madrid (2004), London (2005), Burgas (2012), Paris (2015), Brussels (2016), Nice (2016), Berlin and Wurzburg (2016), Westminster (2017), Manchester (2017) and more, governments across Europe have seemed to perceive themselves as being in a state of emergency, and Bulgaria is no exception. The current situation in Syria, Iraq and Yemen, and the emergence of myriad jihadist organisations across the Middle East, have led to new forms of radicalisation. The terrorist act in Burgas, Bulgaria, on 18 July 2012 was a stark demonstration of Bulgaria's vulnerability to acts of international Islamist radicalisation. This incident was the first European case of terrorism since the London attacks in 2005, and it ended a period of relatively low-level terrorist activity.

Bulgarian Muslims comprise about 13% of the country's population (National Statistical Institute, 2011a). Thus, Bulgaria is the EU member State with the largest autochthonous Muslim community, and the largest share of Muslim citizens. The socio-economic status of Bulgarian Muslims is considerably lower than that of non-Muslim Bulgarians: there is a drastic discrepancy. So much is reflected in national statistics. The average Muslim's chances of employment are half those of the average non-Muslim. One in five non-Muslims is unemployed, while three in five Muslims are unemployed (National Statistical Institute, 2011b). Only about 30% of Bulgarian Muslims complete their secondary (high school) education, compared to 47% of non-Muslims.

In terms of tertiary education, the gulf is even wider – only 5% of Bulgarian Muslims graduate from university, while 23% of non-Muslims obtain a university diploma or degree (National Statistical Institute, 2011b). There is no accredited Islamic higher education in the country, and many Koranic courses have been suspended by the State authorities out of fear of Islamist radicalisation (Zhelyazkova, 2012). There is also a tendency towards the 'enclavisation' of Muslim minorities: They inhabit either specifically designated neighbourhoods in cities, or distinct areas in the provinces (Mahmood, 2004). This preliminary overview brings enough evidence to bear to allow us to conclude that there is inequality between Muslims and non-Muslims in Bulgaria.

Significance of the study

Although the security threats related to international and home-grown Islamist radicalisation appear to be on the increase in the EU (with the caveat that there has been a seemingly-temporary pause during the acute phase of the covid-19 crisis), no in-depth studies have yet been conducted with regard to how Bulgaria might be exposed to such risks (Europol, 2015). Until today, only one academic publication has comprehensively discussed the threats of Islamist radicalisation in Bulgaria, and it was produced over a decade ago (Prodanov and Todorova, 2005). In light of recent terrorist attacks and reports of radicalised citizens travelling to the Middle East, the proposed study appears to be timely and topical.

In addition, the arrested, supposed-terrorist collaborators and their communities come from the Roma population of Bulgaria. What is fascinating about them is not their historical marginalization, illiteracy, poverty and low maternal survival rates (NSI, 2011a, 2011b), significant though these factors are for Roma public health. Rather, what is striking is that those arrested, and their communities are Muslim converts who have been calling themselves Muslim *for less than a decade*, and they were previously Evangelical Christians for *just one decade previously* (24 hours, 2010). It seems there is a lot to unpack when it comes to identity, collective identity change, marginalization and the State regulation of identity.

The significance of my study is magnified by the recent refugee crisis. As one of the EU's external border countries, Bulgaria receives a huge influx of asylum-seekers and immigrants, the vast majority of whom are Muslim. For the period 2011-2017, 62,395 people applied for asylum in Bulgaria (SAR, 2017). While some are smuggled into the interior of the EU, most remain in Bulgaria, where they dwell in abject conditions and endure police brutality (Doctors without Borders, 2013; Oxfam, 2015). Thus, the disenfranchised Muslim minority is growing in numbers, and the conditions of inequality are not only persisting, but are taking a different form: the marginalization of Roma is being added to by the different marginalization and abject poverty of asylum seekers.

Thesis structure

The thesis is structured as follows. In this first, introductory chapter, I set the parameters of my research – I propose my research questions and outline my case study approach.

In Chapter Two, I introduce the reader to my understanding of the history of Muslim minorities in Bulgaria. I believe this is important, as historical narratives were the focus of much political debate during the campaign leading up to the ban. Bulgaria has a long and not very peaceful history of Muslim to non-Muslim relations. This historical examination also provides the reader with some background information on the minorities whose representatives I interviewed,

which will be useful for making sense of some of the themes that emerged during my research.

Chapter Three then focuses on the legislative procedure in Bulgaria. I will discuss the passing of legislation, the type of legislation the ban represents – namely, an administrative act. I will also discuss the process of passing the ban by relying on parliamentary reports. This is an important aspect of the context, as the reports contain the dominant value judgements that informed the ban as well as their justification in argumentation provided by key public figures. This legal chapter will also introduce the text of the ban and the text of its official 'motivation'. The 'motivation' or 'motives' in Bulgarian legislation is a text that is often attached to official bills, and it is composed by the steering group behind the bill. This is a document that also illuminates key value judgements and narratives that were part of the pro-ban campaign.

The value of taking a systemic approach when investigating matters of legal intervention in identity is discussed in Chapter Four. This chapter engages with the main developments in systems thinking, as well with the value of systemic intervention as a research approach.

As my methodology is rooted in systems thinking, this chapter helps set the scene for Chapter Five – focusing on my methodology and methods. In it, I articulate why my research is placed in relation to systemic intervention. Chapter Six also presents my aspiration to use the creative design of methods.

Since the ban seeks to regulate identity expression by making one type of identity expression illegal, Chapter Six will review relational theories of identity. I will present the debate between individualists and communitarians and the way it has been addressed in the literature on systems thinking. Indeed, systems thinking advocates the exploration of multiple boundaries when looking at an issue, both from a theoretical and methodological point of view.

Chapter Seven contains my findings, together with systemic reflections on them. They rest upon the conversations I had with Muslims in Bulgaria in the summer of 2019, as well as on the theories and ideas I will have presented in previous chapters. While I appreciate that systemic reflections can emerge from interacting

with data (Glaser and Strauss, 1967), I also value the role of pre-existing knowledge. It was only because I was acquainted with Midgley's (1992, 2015) marginalization theory and Checkland's (1981) soft systems methodology, that my analysis was possible in the format in which I undertook it. Thus, I looked at the data equipped with some methodological and theoretical knowledge, albeit keeping an open mind to what insights I could gain from it.

My theory-building chapter is second to last – Chapter Eight. In it, I review theories of institutions and law, and I argue that law plays an important role in value judgements, including those relating to identity.

The final chapter, Chapter Nine, aims to provide a succinct answer to each of the research question I have listed below. The final chapter also points towards limitations of the study, and future research directions.

Research questions

The ban is a legal intervention in identity expression. Uncertainty about the effects of such bans has already been expressed in academic circles. For instance, similar legislation has previously been implemented in France and Belgium (Pei, 2012). Indeed, recent research suggests that, although these bans are officially aimed at enhancing security, they do not necessarily make countries safer. On the contrary, countries that pass face-veiling bans tend to suffer more lethal terrorist attacks than others (Saiya and Manchanda, 2019), although causality is difficult to establish – it could be argued that the ban is a response to an already-present threat rather than a motivator of violence. It seems that these bans *might* generate wider systemic effects that most people would view as undesirable. Thus, I formulate my first research question:

1. What are the systemic effects of the face-veiling legislation in Bulgaria in terms of Muslim identity formation?

While the case I have investigated is situated in a single country, Bulgaria, this case also provides an opportunity for theory-building and contributing to the systems literature on identity and marginalization. Midgley's (1992) marginalization theory postulates that people or issues are marginalized in relation to others when they are attributed a special positive (sacred) or negative (profane) status. Clearly the ban, and the circumstances that led to its design and approval, involve the attribution of profanity, where Muslim identities are deemed dangerous and in need of pacifying. It seems appropriate to look at the role of legislation and identity, and their relationship to marginalization theory. I will rely on individualist and communitarian debates on identity as well as on institutional theory and will seek to add to the theorizing of marginalization. The following research questions will inform my inquiry:

2. What is the relationship between marginalization and identity formation?

3. What is the role of State intervention in identity formation?

Finally, upon producing new insights about identity and marginalization, and how these issues play out in Bulgaria, I will arrive at the production of knowledge that I hope will be useful for future policy making. Hence, I propose my final research question:

4. What are the policy implications of my investigation?

Conclusion

The empirical aspect of my research investigates State-led intervention into identity, with a focus on Bulgarian counter-terrorism policies (specifically, the banning of the face-veil) that target Islamist radicalisation. The research will contribute to our understanding of the dynamics between marginalization and identity formation in the context of State-led intervention. My aim is to unveil how marginalization affects a wide range of stakeholders with a Muslim background. The relationships between identity and identity *governance* will be scrutinised. With the help of systems thinking, I hope to review and illustrate the emergent patterns of identity formation that follow such an intervention.

Chapter 2 : History of the Bulgarian State and its Muslim Minorities

The present thesis concerns identity and its regulation. Identity and regulation are meaningless without historical context, given the path dependency of social systems (Mahoney, 2006). As I have chosen interviewees from specific Muslim ethno-social groups, it is clear that shedding light on the history of these groups would illuminate both the context of my study and provide justification of my sampling. Therefore, the purpose of the present chapter is to discuss the relevant Bulgarian history. While there are many different ways to construct a historical account (see Flood and Gregory, 1988, for a discussion of paradigms of historical analysis and their relevance for systems thinking), this chapter will be confined to statements of widely accepted fact (but with some caveats on what counts as a 'fact', to be discussed shortly). I do not claim to have made any contribution to reinterpreting Bulgarian history.

More specifically, the thesis draws materials from the experiences of Bulgarian Muslims in relation to a burqa ban passed by the Bulgarian government. The relevant narrative, then, is that of the Bulgarian State and its relationship to Islam. That story is complex. A Bulgarian State has existed intermittently since the seventh century and, for five hundred years, what is now Bulgaria was governed and administered by Muslims. Today, over a tenth of the population practices Islam. To see how this state of affairs came to be, the reader must consult a somewhat lengthy historical account. That account has two key elements: the rise and fall of the Bulgarian States and the various Muslim groups that inhabited them.

In the beginning of this chapter, I will overview the history of Bulgarian Statehood from the seventh century to the modern era. I will begin with the foundation of the first Balkan Bulgarian State in 681. Thereafter, I will discuss the country's Christianisation in the middle of the ninth century and the geopolitical struggles that followed it. Then, I will describe in general terms the history of Bulgaria in the Ottoman Empire, its subsequent independence, the ascent of Communism after World War Two, and its transition to capitalism up until the face-veil ban in 2016.

Appendix 1 contains a detailed timeline of the history of Muslim minorities. All these historical benchmark events caused changes on the socio-political stage in Bulgaria and directly influenced both Muslim and non-Muslim people. Hence, it is important to review these historical events in light of their involvement of Bulgarian Muslims. This is not to say that we can speculate what their effects upon Muslims were, as it is impossible to have a discussion with an interviewee from the 15th century. However, these events have certainly given rise to national narratives and have informed social structures that are relevant to my study, and these are what I aim to unveil through the present historical review.

The history of governance has elites and majorities as its protagonists and key influencers. In the second half of this chapter, I will shift my focus from the centres of power to their peripheries. Specifically, I will discuss the experiences of five Muslim minorities. For lack of a better criterion, I have ordered them by present-day population size. I will begin with the largest minority – the Roma, whose migration to the Balkans commenced in the 14th century. I will continue with the Turkish, whose sultans conquered the Balkans in the fourteenth century and remained in power until the end of the nineteenth. The nowadays descendants of the Turkish settlers are numerous and well organised politically. I will also describe the history of three smaller Muslim minorities: the Pomaks, who are slavophone Muslims; the Gagauz, who are Turkophone Christians; and the Arabs, who are a small but significant minority in modern Bulgaria.

The time is opportune to make three preliminary points. Firstly, as noted earlier, the text that follows is intended as a basic overview of Bulgarian history. I have aimed to craft it as reasonably accessible to uninitiated readers. To that end, it must be kept relatively short. The reader who is interested in a more in-depth analysis of Bulgarian, Balkan, or Ottoman history is invited to consult the sources that are cited within the text. Secondly, history is contentious. As writing was not widespread in pre-Christian Bulgaria, much of Bulgarian history in that period is reconstructed from Byzantine sources. Throughout their coexistence, the Byzantine Empire and Bulgaria engaged in constant warfare. Thus, Byzantine reports of Bulgaria need to be viewed critically: as Carr (1961) makes clear, the winners of conflicts have a tendency to write historical accounts that favour their own interests. Closer to the modern era, there is a lot of controversy over Muslim-

Bulgarian relations during Communism. In addition, very little is known of the arrival of some ethnic minorities to Bulgaria, including the Roma, the Pomak and the Gagauz. Keeping these facts in mind, I appreciate that ambiguity is unavoidable, and I have striven to avoid controversies by sticking closely to historiographic orthodoxy. Finally, history is relevant to the thesis only to the extent that it shapes contemporary ethno-religious groups and their relations. The narrative which this chapter presents – which is only one account of the formation of the Bulgarian State and its relation to faith – is geared towards capturing the tensions that animate Muslims and Christians (or better still, non-Muslims) in the country today.

History of the Bulgarian State

Foundation (681)

The first Balkan Bulgarian State was founded in 681 (Tsanev, 2006). The territory of modern Bulgaria had, by then, been inhabited for thousands of years. Before the Bulgarians, the modern territory of Bulgaria was inhabited by the Thracians and the Slavs, who were the local population when the Bulgarian tribes (Called Bulgars or Protobulgarians) first arrived. Thus, the contemporary Bulgarian population is composed of mainly Thracians, Slavs and Bulgars. While, after its establishment, the country bore the name of its dominant tribe, the other tribes retained their influence, most notably in the language, as the Bulgars adopted the language of the Slavs. The religious rituals of all three became entangled, and later on were unified under the umbrella of Christianity (Tsanev, 2006). In the period of antiquity up until the seventh century, the Balkans were conquered, first by the Macedonians, then by the Persians, and finally by the Romans. By the 6th century AD, the Thracians had been Hellenised (Mikhailov, 2017). Their territory – which included modern-day Bulgaria – came under the control of the Byzantine Empire.

Bulgarian is a Slavic language. Slavs entered Europe during the Great Migration (Curta, 2008). Since they were not literate, little is known of their whereabouts prior to settlement. They made their appearance in the Balkans in the 6th century AD, and settled south of the Danube River (Angelova, 1980). That migration did

not involve any territorial concessions on the part of the Byzantine Empire, which held the territory until 681.

Although modern Bulgaria is predominantly Slavic in its culture and language, the first Bulgarian State was not founded by Slavs. Instead, the Bulgars – a nomadic tribe that had settled down by the Volga in modern Russia – waged a series of successful wars on the Byzantines. In the early 6th century, the nomadic Bulgars established Volga Bulgaria (Zimonyi, 1989). Like other nomadic empires, Volga Bulgaria did not survive the death of its founder, Khan Kubrat. One of his sons, Asparukh, led the Bulgars into Bessarabia. From there, they began a war of conquest against the Byzantines (Tsanev, 2006). At the Battle of the Ongal, the Bulgars inflicted a decisive defeat on the Byzantines[2]. Consequently, they were able to push the Byzantine troops to the Balkan Mountains and, in the next year, further south into Thrace. The Byzantines eventually sued for peace and recognised the new State. The 681 treaty between the Bulgars and the Byzantines marked the beginning of Bulgarian statehood.

Present-day Bulgarians identify strongly with the State that was founded in 681. Modern Bulgarian governments have sought to capitalise on Asparoukh's military successes. For instance, in 1981, the socialist government launched a very expansive programme of monument construction to celebrate 1300 years of Bulgarian Statehood (Manchev, 2008).

Whatever the circumstances surrounding the Bulgarian conquest, in 681 the new Bulgarian State faced severe challenges, which were both external and internal.

---

[2] Another aspect of the foundation story, which likely corresponds to reality, is that the Byzantine emperor, Constantine IV, suffered a sudden bout of gout on the eve of the battle. He went south to Nessebar to recuperate. The Byzantine soldiers, not informed of his illness, assumed that the emperor was fleeing, which enabled the Bulgars to rout them. Contemporary chronicles confirm that Constantine IV did suffer from gout. The subsequent Bulgarian success, however, is probably better explained by the Eastern Roman Empire's exhaustion from the two defensive wars it had been waging against the Arabs in the East.

Internally, the Bulgars formed the ruling class, but were an overall minority: the majority of their subjects were Slavs. Externally, they faced extreme military pressure from the Eastern Roman Empire, which considered the Bulgarian territory a core part of its domain. It was not until the early 9th century that consolidation was achieved under Khan Krum (Ignatov, 2017). Krum inflicted a critical defeat on the Byzantines at the Battle of the Varbitsa Pass. In the aftermath of that battle, he executed the captured the Byzantine Emperor, Nicephorus I. Krum had the skull engraved and used it as a cup (Tsanev, 2006).

The symbolism of that gruesome episode is of considerable importance to the contemporary popular interpretation of Bulgarian history. Subsequently, Krum was able to conquer Adrianople and died while preparing an assault on Constantinople. His son, Khan Omurtag, negotiated a thirty-year peace with the Byzantines. His reign was also marked by heavy spending on infrastructure, the establishment of a large, fortified capital at Pliska, and the general decline of nomadic customs among the Bulgars (Angelov, 2013). Omurtag's successors, Malamir and Presian, conquered Macedonia and likely subjugated Serbia. By the time Presian's son, Boris, had come to power, Bulgaria was a very large (albeit new) State, which yielded considerable military, diplomatic and economic influence.

Christianisation (864-893)

Khan Boris, as he then was, came to the throne in 852. Bulgaria, now an established regional power, faced two challenges. The first was internal: the population comprised a Bulgar minority, which held power, and a Slavic majority. The two ethnicities had different religions: the Slavs were polytheistic, with beliefs similar, although not identical, to those of German and Scandinavian tribes that had also migrated to Europe around the same time. The Bulgars, like other Turkic tribes, were Tengrist and believed in a sun god. Despite their differences, there are no accounts of clashes between Slavs and Bulgars. In fact, there are records of mixed marriages (Dimitrov, 2005). However, the religious and ethnic diversity in the country, and the fact that the ruling elite was distinguishable from the ruled majority, was of grave concern to Boris.

The geopolitical situation facing Boris was also challenging, as Bulgaria was not the only nation to wage successful wars of conquest in the early Middle Ages. By the 9th century, Bulgaria was facing threats from Great Moravia, the Eastern Franks, and Byzantium, which were all Christian States. Those Christian States would often ally against the pagans, as the latter were seen as inferior and barbaric compared with the sophisticated and enlightened Christians (Angelov, 2013). It would have been obvious to Boris that a pagan Bulgaria would be unlikely to withstand a united Christian invasion.

Towards the middle of his reign, Khan Boris decided to convert and to enforce Christianity as a mandatory State religion. Historians have speculated that his motivations did not stem primarily from international security (Dimitrov, 2005; Nikolov, 2012). This new religion, common to Bulgars, Slavs, Thracians and other remaining minorities, would lay the foundation for the homogenisation of Bulgarian culture, which would subsequently strengthen the State. Additionally, Christianisation would become a foreign-relations asset for the reasons presented above. Initially, Boris appears to have leaned towards Catholicism, since conversion would have enabled him to ally with the East Franks against the Byzantines (Todorov, 2010). However, in 863, the Byzantine basileos, Michael III, marched on Bulgaria, conquering modern-day Plovdiv and Nis (Gjuselev, 1988). Boris, accordingly, expressed an interest in converting to Orthodox Christianity. In 864, Boris did just that at Pliska, adopting the title *knyaz* ("king"), Mikhail as his name, and Michael III as his godfather. Soon after, Byzantine missionaries arrived in Bulgaria to begin converting the general populace (ibid).

It is critical to note that Christianity was forced on most Bulgarians. There does not appear to be much evidence of missionary activity prior to 864. Christianity had been seen as the religion of the Greeks, who had waged near-constant warfare on Bulgaria for two centuries. Accordingly, local attitudes to the new faith were exceedingly hostile. In 865, a year after Boris-Mikhail's conversion, 52 nobles rebelled. Boris executed all of them, which caused the effective annihilation of his administrative apparatus. Some twenty-four years later, Boris-Mikhail abdicated in favour of his son, Vladimir. In his four-year reign, Vladimir tried to restore paganism to Bulgaria. In 893, Boris-Mikhail left the monastery, defeated his firstborn and had him blinded. Thereafter, he placed his third son, Simeon, on the

throne. Simeon, as will be seen shortly, was extremely successful. In the modern period, the lurid story of his ascension has often been used to underscore the irreversibility of the country's adoption of the Christian creed.

Popular myth aside, Christianity encountered persistent and systematic resistance in Bulgaria (Sullivan, 1966). The adoption of Christianity was secured violently, through Boris-Mikhail's unwavering ruthlessness. Over a period of twenty-five years, at least two large civil conflicts took place. Both required heavy-handed military intervention. The populace, as was common all over Europe, retained many of their pagan rituals, some of which survive to this day. Hence, it would not be correct to say that Christianity was brought to Bulgaria voluntarily or that it ever commanded any considerable degree of popular acceptance in 9th century Bulgaria.

Christianisation did, however, pave the way for the consolidation of Slavic and Bulgar culture. The Bulgarian Church was initially subservient to the Greek, and mass was read in Greek. Two Greek scholars, Cyril and Methodius, commissioned by the Byzantine court, had developed a Slavonic script to be used in the conversion of Great Moravia. The Byzantine missionaries were eventually expelled from Moravia. Boris-Mikhail seized the opportunity and invited Cyril and Methodius's disciples to set up a school in Ohrid, then a part of his kingdom (Tsanev, 2006). In 893, after deposing his son Vladimir and before elevating Simeon to the throne, Boris-Mikhail convened the Council of Preslav. At the Council, a decision was made to move the capital from Pliska to Preslav. More importantly, the Slavic language was proclaimed the official language of both State and church. This, coupled with the presence of Cyril and Methodius's disciples, prompted the gradual disappearance of linguistic differences between the Slavs and Bulgars, as well as a Golden Age of Bulgarian culture. That Golden Age, which is also critical to modern narratives about Bulgarian history and identity, arguably produced a linguistically homogenous community. Centuries later, under Ottoman rule, it was linguistic and religious homogeneity that provided the impetus for the formation of a Bulgarian national identity.

The First and Second Bulgarian Empires (893-1396)

Boris-Mikhail's son, Simeon, presided over a period of territorial and cultural expansion. Most of Simeon's reign was taken up by wars against Byzantium. After the death of Emperor Leo VI, a succession crisis began in Constantinople. Simeon, who had been educated in the Byzantine court, was able to become involved and arranged a marriage between one of his daughters and the infant Constantine VII, who was Leo's lawful successor. However, Constantine's mother Zoe was able to gain power in the Byzantine court and annulled the betrothal, prompting Simeon to begin a military campaign against Byzantium. The Byzantines suffered a crushing defeat at Anichallo, one of the largest military engagements of the period (Tsanev, 2006). Simeon then entered Constantinople and was crowned Emperor (*Tsar*[3]) of Greeks and Romans. Although the title would co-exist with that of the Eastern Roman basileos, its granting is nowadays recognised as a turning point in Bulgaro-Byzantine relations. The Byzantines, wary of Bulgarian military prowess, refrained from any major military operations in the next four decades. In anglophone publications, the Bulgarian State that emerged is known as the First Bulgarian Empire.

Simeon was also instrumental in the accumulation of a new body of Bulgarian literature, mostly religious in nature. Initially unfancied as a political leader, he had been educated in Constantinople with a view to entering the clergy. Once in power, Simeon became a patron of the literary arts, as well as writing short works of theology himself. Driven by an ambition to establish an imperial capital to rival that of the Byzantines, he erected a large city complex, with at least twenty churches and monasteries.

It is hard to overstate Simeon's importance to Bulgarian identity formation. In historical terms, he ensured the long-term security of the Bulgarian State and the continuous adoption of Christianity. The resultant reduction in military

---

[3] In Bulgarian historiography, the term *'tsarstvo'* is preferred. That word translates as 'the domain of a Caesar'. The word *'imperiya'*, which means 'empire', is not used now and does not appear to have been used in the past.

expenditure generated a large surplus and ultimately made possible the production of cultural and religious artefacts, such as coins, icons, paintings, murals, and such like, which in the eyes of the public referred to a Bulgarian ruler in the Bulgarian language (Bobchev, 1928).

Bulgarian national identity did not, of course, form in the early Middle Ages. However, the size and wealth of Simeon's empire was critical to the stirring of nationalist sentiment in the eighteenth century that ultimately led to the formation of a nation State in the nineteenth. In contemporary Bulgaria, the three seas which Simeon's empire bordered are frequently taken to be the 'natural' borders of the Bulgarian State (Daskalov, 1998). As a symbolic figure, Simeon has been evoked by political parties, both left- and right-wing, to justify nationalist policies. Simeon also serves as a reminder of Bulgaria's cultural achievements in the Middle Ages.

Simeon was succeeded by his son, Petar. Petar concluded a peace treaty with the Byzantines. This enabled him to focus on cultural and ecumenical affairs for most of his reign. By far the most critical change in Bulgarian society during his reign was the rise of the Bogomilist sect. Bogomilists believed that Satan and Jesus Christ were both sons of God. In their belief system, Satan had created the material world. Accordingly, they rejected materialism. Critically, they took this to include all State-backed institutions, including taxation, marriage and the Church (Lavrin, 1929). Petar was aggressive in suppressing the movement, expelling many of the Bogomils. They settled in Serbia, then later on in modern-day Bosnia. Across the Balkans, Bogomils were a sizable religious minority that was persecuted by most, but not all, Orthodox rulers of the time. Although the sect did not survive, it influenced the development of Balkan societies considerably, in two ways. Firstly, sectarian division is likely to have contributed to the decline of the First Bulgarian Empire after Petar. Secondly, the Bogomils formed their own communities, which were treated unfavourably by local rulers. This status quo persisted for centuries. When the Ottomans conquered the Balkans in the 13th and 14th century, they found the Bogomil segments of the population willing to convert to Islam. These converts formed the core of today's Muslim Pomak population (Mladenov, 1979).

The decline of the First Bulgarian Empire began towards the end of Petar's reign (Runciman, 1930). The Magyars and Kievan Rus began raiding the Empire. In 969,

Sviatoslav I defeated the Bulgarians at Silistra. Petar abdicated, and his son, Boris II, was forced to seek Byzantine assistance to repel Kievan Rus. The Byzantine intervention was a success, but it came at a high cost: the eastern part of the Bulgarian State fell under Byzantine control. With Petar's son Boris in captivity, Samuil I became Tsar. Between 976 and 1014, Samuil fought a series of wars against the Byzantines. Although he enjoyed considerable success in the early stages of the campaign, by 1014 the Bulgarian State had dwindled. Eventually, the Bulgarian army was routed at Kleidon. The Byzantines blinded all survivors and sent them back to Samuil's camp in Prespa. Upon seeing his blinded army, the Tsar died of a heart attack. His son, Gavril Radomir, was killed by a cousin, Ivan Vladislav, who in turn was killed by the Byzantines at the Siege of Dyrrhachium. In 1018, the Bulgarian nobility surrendered to the Byzantines. After four centuries of resistance, Bulgaria became a Byzantine province.

The Byzantines remained in control of Bulgaria for more than 150 years. Between the fall of the First Bulgarian Empire and the rise of the Second, there was one major rebellion in 1040. The Byzantines suppressed it with ease. The Bulgarian nobility was incorporated into the Byzantine imperial system. During the eleventh century in particular, Byzantium was enjoying a period of prosperity, which would have made rebellions abortive and potentially counter-productive.

However, in 1180, the Komnenos dynasty fell in Constantinople, and turmoil followed. The new Emperor, Isaac II, sought to levy heavy taxes on the Bulgarians. Two brothers, Theodore-Petar and Asen, led a rebellion in 1185. The Byzantine Empire was embroiled in a conflict with the Crusaders, which permitted the Theodore-Petar and Asen to capture Moesia and Northern Thrace. A long war of attrition ensued. The Bulgarians commanded a serious military advantage, advancing far into the Greek heartlands of the Empire (Wolff, 1949). Eventually, Asen – who had been acting as Tsar – was assassinated by a Greek agent in 1196. Theodore-Petar nominated Kaloyan to act as Tsar, before himself being murdered in 1197. Kaloyan intensified aggression against the Byzantines, who by then were heavily embroiled in a military conflict against the Latin Empire. The Latins famously wound up sacking Constantinople. In the aftermath of the sack, Kaloyan allied himself with the Byzantine nobility and defeated the Crusaders at Adrianople, imprisoning their Emperor, Baldwin I, in his capital at Tarnovo.

Two years later, Kaloyan died, aged 35. A twelve-year interregnum followed in which the Serbs, Byzantines and Magyars made small gains on Bulgaria. The Second Bulgarian Empire's fortunes were restored in the reign of Ivan Asen II. Theodor, the Despot of Epirus – the most powerful Byzantine warlord of the time – marched on Bulgaria with a large army with a view to taking Constantinople. Ivan Asen defeated Theodor at Klokotnitsa, and was able to vassalize Epirus, a large territory that at the time included most of Northern Greece, including modern-day Thessaloniki. With that conquest, the short- to mid-term survival of the Second Bulgarian Empire was secured (Ovcharov, 2017).

The long decline of the Second Bulgarian Empire began towards the end of Ivan Asen's reign. It was then that the Mongols began raiding Eastern Europe. With a large amount of resources diverted to combating the constant Mongol threat, the Magyar, the Latins and the Serbs were able to chip away at Bulgaria's borders. Eventually, in 1277, the Bulgarian peasantry organised its own army, which defeated the Mongols. The leader of the peasants, Ivaylo, then marched his army on the capital, Tarnovo, and seized the throne. Ivaylo was immediately opposed by the Byzantines and the Bulgarian nobility. A series of wars between Ivaylo, the nobility, the Mongols and the Byzantines followed. By 1300, it was not altogether clear who was in power in Tarnovo, with the Mongols eventually instating a Mongol ruler, Chaka, on the throne.

Although the Mongols were deposed quickly after 1300, the Second Bulgarian Empire had entered a period of terminal decline. Tarnovo found itself increasingly unable to police the periphery of the country. Mongol raids, though less intense than before, continued, as did wars with the Serbs and the Byzantines. In 1344, the Ottomans made their first appearance in the Balkans as mercenaries in a Byzantine civil war in which Bulgaria had become embroiled. Soon thereafter, they began conquering territories in Southern Bulgaria. In 1371, the then-tzar, Ivan Shishman, died, and his dominion was split between his sons. The Turks, who had a tremendous numerical advantage, encountered little resistance. Tarnovo fell in 1393, whereas Vidin, the last Bulgarian stronghold, was subjugated in 1396. This marked the end of the Second Bulgarian Empire. For the next five centuries, Bulgaria would be an Ottoman province.

The Ottoman Empire (1396-1878)

The Ottoman conquest, unlike the Byzantine one two centuries earlier, transformed Bulgarian society, whose ethnic and religious composition was altered dramatically. The conquest also coincided temporally with the formation of Bulgarian national identity. The repercussions are still felt today. Therefore, it is important and relevant to outline the main political, social, and religious aspects of Ottoman rule in the Balkans.

First and foremost, for most of the late Middle Ages, the Ottomans commanded an insuperable military and economic advantage that rendered the prospect of Bulgarian independence extremely remote (Inalcik, 2013). Military campaigns against the Ottomans invariably failed. For example, the Polish king Wladislaw led what became the last Crusade against the Turks. He was killed at the Battle of Varna in 1444. Ottoman expansion would continue unchecked until 1683, when the Polish finally defeated the Turkish at Vienna. Given that the most advanced militaries of the period could not even contain the Ottomans until the seventeenth century, there was no serious prospect of a popular rebellion restoring the Bulgarian State.

Second, the Ottomans imposed their system of governance on conquered nations. Conquered territories, Bulgaria included, were ruled by Turks. An Ottoman administration was put in place and taxes were collected by Ottoman officials on behalf of the Ottoman Sultan (ibid). The Bulgarian nobility appears to have been exterminated completely during the conquest (Pavlov, 2019). This, coupled with the Empire's highly discriminatory policies against non-Muslims, is likely to have fostered a considerable sense of resentment in the local populace.

Third, the Ottomans made a concerted effort to spread Islam in the Balkans. There is considerable historical disagreement as to the extent of forced conversions (Norris, 1993). However, it is beyond doubt that converting to Islam held many advantages for individual subjects of the Sultan. Muslims enjoyed the full protection of the law. Moreover, the Sultan would usually levy oppressive taxes on Christians, so that conversion very often made immediate economic sense. This system of inducements, which was likely combined with force at times, produced

a sizable Slavic Muslim population. In addition, indigenous Muslims, including Turks and Arabs, migrated to the Balkans and settled there permanently (ibid).

Lastly, the Ottoman system of governance was based on an assumption of constant territorial expansion. After Vienna, the Empire could no longer make progress in Europe, and it began its decline (Lewis, 1958). Although the military balance still foreclosed rebellions, the collapse of State institutions caused considerable damage to both conquerors and conquered. With Ottoman control waning and Ottoman society transitioning to a more settled way of living, conditions emerged that favoured the formation of Bulgarian national identity and the subsequent struggle for independence, first religious and then political.

In Bulgarian historiography, the period in which Bulgarian national identity was formed is known as the Bulgarian Revival. Like in Renaissance Europe, the earliest evidence of nation formation is literary. In the 18th centuries, educated Bulgarians accessed culture via Greece, which too was an Ottoman province. Some Bulgarians began to actively identify with the Greek, whose culture was universally considered more prestigious. A Bulgarian monk, Paisiy Hilendarski (1762), wrote a book called *The Slavonic-Bulgarian History*. The book was intended to highlight the historical pedigree of the Bulgarian nation, and much of it focuses on the political achievements of the medieval Bulgarian States. Critically, it was written in contemporary Bulgarian, which enabled its rapid assimilation by both literate and illiterate Bulgarians – the ones who could not read easily absorbed it during literary reading sessions.[4] Paisiy Hilendarski's work prompted renewed interest in Bulgarian, as opposed to Greek, culture. It also lay the foundations of identity-formation: a theme that runs through the book is the existence of a separate Bulgarian nation, Slavic in origin, with its own language (Detrez, 2013).

---

[4] Quite similarly, albeit five centuries earlier, Aligieri's (1320) Divine Comedy was written in the contemporary spoken Italian, also known as *volgare*. Writing in spoken language in then Italy and, respectively, Bulgaria, was not acceptable as printed works were issued in the formal language, inaccessible to the majority of the population. It was Hilendarski's and Dante's intention to launch a pop project that could be easily assimilated by the mass audience.

Paisiy Hilendarski's history, and the campaign to circulate it, contributed to the emergence of printed books written in the Cyrillic script. The first printed copy dates from 1806. Around that time, a literary Bulgarian idiom – as opposed to the vernacular – was consolidated, which in turn brought about a national literature (Moser, 1972). Bulgarian schools were built, and around the 1840s, Bulgarian periodicals began to circulate in the Balkan holdings of the Ottoman Empire. The slavophone population of the territory of the former Bulgarian Empires began identifying with its history, its culture and its language.

Bulgarian nationhood initially manifested in the struggle for religious autonomy, which was directed against the Greeks (Hopkins, 2006). After the Ottoman conquest, the formerly independent Bulgarian church had been subsumed under the Patriarchy of Constantinople, which the Ottomans had maintained. In 1829, the citizens of then-Bulgarian Skopje sent an official demand to the Patriarch, demanding the establishment of an autocephalous Bulgarian church. A Bulgarian temple was built in Istanbul. On Easter 1860, Hilarion of Makariopolis, an important Bulgarian cleric, began conducting services without the hitherto mandatory mention of the Patriarch. He was duly exiled. By then it was too late, as Bulgarian autocephaly had become a matter of great interest to the Ottoman authorities. Eager to maintain good relations with Russia, Sultan Abdulazis issued a decree establishing an independent Bulgarian exarchy. In the process, the Bulgarian nation had defined itself politically in opposition to the Greeks (Genchev, 2010).

Around the midpoint of the 19th century, Bulgarians began demanding political independence from the Ottoman Empire. In 1861, Rakovski formed a Bulgarian legion in Serbia. In 1867, a few months before his death, Rakovski set up the Bulgarian Revolutionary Central Committee, which began arming guerrilla units that were involved in sporadic fighting in the Balkans. The younger generation of revolutionaries, and in particular Karavelov and Levski, established a web of revolutionary committees within Bulgaria. Although Levski was captured and executed in 1873, the organisation survived. In 1876, a decision was made to stage a nation-wide uprising (Mitev, 1988).

The April Uprising of 1876 was short-lived, with the Turkish army quickly asserting control over Bulgaria. After it had suppressed the rebellion, the underfunded Turkish army unleashed its irregular corps, the *bashi-bouzouk*, onto the local population. The massacres that followed took between 10,000 and 30,000 civilian lives (ibid). Western observers were allowed on the scene of several massacres, notably the one in Batak. Reports of Turkish brutality filtered around Europe, with public opinion in Britain heavily influenced by reports of lurid violence (Seton-Watson, 2012). At the time, Turkey was heavily dependent on British support to contain Russia, whose territorial ambitions extended to Istanbul and beyond. With the British government in a delicate position, Russia began exerting pressure on the Ottomans. A conference was held in Istanbul, where it was decided that Bulgaria and Herzegovina would become independent States under the joint control of the Great Powers (ibid). The Ottoman Empire, which had not been party to the proceedings, refused to honour that agreement. Russia declared war in 1878. With its Western allies unwilling to prop up the Ottomans, the Sultan's armies were routed, and by 1878 Russian armies were progressing steadily toward Istanbul. At that stage, the British made it clear that they would protect Constantinople. Tsar Alexander, unwilling to risk a further confrontation, negotiated the Treaty of San Stefano. Bulgaria became an independent country.

The history of Bulgaria's liberation is a critical element of Bulgarian identity today, for two reasons. First, the Christian population, having suffered political repressions of varying intensity over the last five hundred years, suddenly found itself in a dominant position (Neuburger, 1997). As Turks were killed, expropriated and forcefully expelled, the Islamic minority was decimated. The narrative of a colonial empire usurping Bulgaria proved extremely powerful, in the eyes of both Bulgarian elites and the soon-to-be-constituted electorate. That narrative was resurrected by the Communist party in the eighties and by the mainstream political parties of the nineties, so that it continues to influence mainstream Bulgarian perceptions of Islam and Turkey. Thus, the Ottoman conquest and its ultimate reversal conditioned modern attitudes to Muslims and their various forms of religious expression.

Second, Russia's involvement in Bulgaria's liberation was considerable. The entire Bulgarian Revival proceeded on the assumption that Bulgaria's identity was and

had always been Slavic. The largest Slavic empire was seen as a natural ally. In addition, Russian statehood was heavily influenced by medieval Bulgaria: the Cyrillic alphabet, Orthodoxy, Tsars, and the restoration of Rome were all ideas that the Russian nobility absorbed from the Bulgarian Empires. Evidence indicates that the war of liberation was seen by many Russian intellectuals, including Western favourites like Dostoyevski, as the first step in the establishment of a Panslavic empire under the Tsars (Sumner, 1935). Russia's foreign policy never went that far, but it was clear to all that the new Bulgarian State would be a natural conduit of Russian interests in the Balkans. The twentieth century, of course, turned out to be different. However, Bulgaria remained in the Russian (and later Soviet) sphere of influence for most of the next hundred years. The narrative of liberation was and still is fundamental to Bulgarians' continued toleration of Russian expansionism (Zilberman and Webber, 2003).

Last but not least, liberation held a great deal of symbolic significance. At the time of liberation, there had been no Bulgarian State for close to five-hundred years. The exploits of the Bulgarian Tsars and Khans would have appeared as distant to nineteenth-century Bulgarians as they appear to us today. The struggle for liberation was instead used to construct a national epic. Levski and Botev, two of the more romanticised figures of the Revival, lent their names to cities, peaks, lakes, schools, and sports organisations. The signing of the San Stefano Treaty is the nation's major national holiday. Bulgarian nationalists, both left- and right-wing, frequently claim to have distilled their ideas from the words of celebrated nineteenth-century revolutionaries (Daskalov, 1998).

The Monarchy (1878-1944)

The Treaty of San Stefano, which ended the Russo-Turkish War, restored Bulgaria to its pre-conquest borders. The formation of a large Russian satellite State in such proximity to Istanbul did not suit the Great Powers. Three months after the San Stefano peace, the Great Powers concluded the Treaty of Berlin. Under that Treaty, Bulgaria was split. The northern part, named the Principality of Bulgaria, was *de facto* independent but formally a vassal of the Ottoman Empire. Southern Bulgaria, which was called Eastern Rumelia in the Treaty, was restored to the Ottomans

under a special administrative regime. Macedonia, which until then had been widely considered a part of Bulgaria, was returned to the Ottomans without reservations.

The Berlin Treaty had two long-term consequences. First, it fomented a very strong sense of Western betrayal (Spencer, 1914). It stands for that idea to this day. Second, the Treaty left the Balkans in an extremely precarious situation, with Ottoman enclaves scattered between newly independent nations with strong irredentist ambitions, including not only Bulgaria but also Serbia and Greece. The resultant tensions would plunge the region, and later all of Europe, into war (ibid).

In 1885, Eastern Rumelia made a unilateral declaration of union and joined the Bulgarian Principality, a flagrant breach of the Berlin Treaty. Serbia, with Austria-Hungary's active encouragement, immediately declared war. The Bulgarian army stopped the Serbs at Slivnitsa, near the border, and advanced into Serbia before Austro-Hungarian threats prompted the rapid conclusion of a peace treaty. A month later, the Bulgarian Principality and the Ottoman Empire concluded the Tophane Treaty, under which the Ottomans recognised Bulgarian unification.

During the early monarchy, the pace of urbanisation grew rapidly. On liberation, Bulgaria had been a predominantly agricultural society. The new Bulgarian State spent heavily on education and infrastructure. The shift to capitalism caused large-scale migrations from the villages to the cities (BAN, 1991). The spread of literacy had important implications for identity formation, in that it permitted the State to inculcate a sense of historicity into its population. Popular attitudes to Muslims were shaped by the narrative of the Ottoman yoke.

The monarchy's foreign policy was directed at the undoing of the Treaty of Berlin. The Bulgarians wanted to enforce their territorial claim on Macedonia, as well as to gain access to the Aegean by making gains in Thrace, at that time still a Turkish dominion. Serbia, Montenegro and Greece had similar ambitions. The four countries formed the Balkan League. In 1912, Montenegro declared war on the Ottomans. The other members of the Balkan League, including Bulgaria, promptly joined the war. The Greeks dominated the Aegean, preventing the Ottomans from transferring troops to the Balkans. This enabled the Serbs and the Bulgarians to march towards Istanbul. The Bulgarian infantry bore the brunt of the fighting,

pushing the Ottomans to Catalca, fifty kilometres east of Istanbul. The Ottomans sued for peace. In 1913, a treaty was concluded through which the empire gave up all of its European territories, with the exception of Albania (ibid).

Less than a month after that treaty, war broke out between the members of the Balkan League. Bulgaria demanded Vardar Macedonia and an Aegean coastline. Serbia and Greece pressed their own claims on the same territories. Bulgaria invaded. The fighting was indecisive. However, in July of 1913, Romania entered the war on the side of the Serbs and the Greeks. Turkey followed soon after. The Bulgarian army, outnumbered and enveloped, capitulated.

The Balkan Wars were a disaster for Bulgaria. The Bulgarian army, which fought several infantry battles during the wars, had suffered heavy casualties. The war effort wrought havoc on the Bulgarian economy (Ivetic, 2012). In addition, the Second Balkan War involved unprecedented atrocities on all sides, with sizable settlements sacked by invading armies. The Balkan Wars were not, however, the end of Bulgarian irredentism. When World War One broke out in 1914, the Bulgarian government was courted by both the Central Powers and the Allies. Since the Central Powers were willing to offer greater territorial gains, in 1915 Bulgaria joined the war on their side, this time allying itself with Turkey and pitting itself against Russia. The Bulgarian infantry dominated the Balkans in the early stages of the conflict, occupying Macedonia and large parts of Serbia. However, the Allies were able to gain an advantage in the West and ultimately broke through the Central Powers' lines. Facing a massive invasion, Bulgaria once again capitulated, losing Dobrogea to Romania, Macedonia to Serbia, and the Aegean to Greece. In line with the punitive policies adopted at the Treaty of Versailles, the Bulgarian State also undertook to pay repressive reparations. Revolts engulfed the country, causing Ferdinand I – the then-monarch – to abdicate in favour of his son, Boris.

Boris' reign saw two major political shifts. Firstly, the conclusive defeat in World War I put an end to Bulgarian expansionism (Nedev, 2013). Bulgaria's borders have remained, with a minor exception, unchanged since the Treaty of Neuilly. During the Balkan Wars and the First World War, the forced transportation of foreigners had become common practice (Ivetic, 2012). Bulgaria expelled large

numbers of Greeks and Turks, and killed others, in order to quell discontent. Its foes reciprocated, so that, by the end of the war, the borders of the Bulgarian State reflected to a very large degree the geographical spread of Bulgarian nationals in the Balkans. Bulgarian identity latched firmly onto the territory under the Bulgarians' political control.

Secondly, the heavy defeats of the Balkan Wars and World War I precipitated a major economic and social crisis. As the Treasury struggled to make payment on reparations, the economy lay in ruins. This was further exacerbated by the Great Depression, which began to engulf Europe in the twenties. The political movements of the Bulgarian interbellum were exceedingly violent (Nedev, 2007). Communists bombed temples, whereas nationalists staged a campaign of mass extermination against agrarians in the wake of an attempted coup in 1923.

It was Boris's firm intention to remain neutral in World War Two. However, after Mussolini invaded Italy, Hitler – whose armies were preparing for Operation Barbarossa – required passage through Bulgaria. Facing a German ultimatum, Boris joined the Axis. Bulgarian forces fought the Greeks, but Bulgaria did not declare war on the Soviet Union. Thus, it did not fight on the Eastern Front. This likely caused Germans to poison Boris, who died on 28 August 1944 (Nedev, 2013). A little more than two weeks later, the Soviet Union invaded, conquering Bulgaria in just two days.

The Second World War had three implications for Bulgarian identity formation. Firstly, Southern Dobrogea – which was populated predominantly by Bulgarians – was returned to Bulgaria on Hitler's insistence. Romania did not challenge the transfer after the war. The Bulgarian State thus acquired its modern borders. Secondly, Bulgaria, though formally allied with Hitler, rescued all of its Jews while making territorial gains. Following the subsequent discovery of Hitler's programmes of racial extermination, Boris's decision ensured that he would be viewed favourably after his death. Finally, the country, like most of Eastern Europe, entered into the Warsaw Pact.

The Republic (1945-present). The Communist regime (1945-1989)

Bulgaria had been assigned to the Soviet sphere of influence at Yalta (Nedev, 2013). As a result, the Soviet Union set about instating a puppet government in Sofia. Boris's six-year old son, Simeon, was expelled from the country and his regents were executed. The Bulgarian Communist Party usurped power, with all opposition declared illegal. The Communist Party followed Stalinist policies to the letter, with mass executions, forced labour, expatriation and show trials, all a pervasive feature of political life in the late forties and early fifties (Ognyanov, 2008).

Communism had a profound impact on Bulgarian society. The Communist party was avowedly atheist. Accordingly, church land was confiscated, the clergy was purged, and observance of religious rites became dangerous, with the devout often risking execution or deportation to extermination camps. The influence of the Orthodox Church on Bulgarian society, to say the least, declined (Metodiev, 2010). The early Communist State was also cosmopolitan. Nationalists, as well as all of their associates, were exterminated systematically in the years immediately following 1945. The State sought to deliver socialism to all of its citizens, irrespective of ethnic origin, with many measures taken to encourage civic participation by minorities (Marinov, 2009). However, the switch to a planned economy caused Bulgaria, whose economy was already damaged by the war, to enter a profound economic crisis from which it did not emerge until well into the 1960s (ibid). The largely agrarian population suffered the brunt of reprisals during the period of mass collectivisation. Finally, Stalin's cult of personality - and the cult of the Soviet Union more broadly - became State policy. Varna, the third most populous city in the country, was briefly renamed Stalin, with smaller towns renamed after various Soviet functionaries. The narrative of Bulgaria's two liberations by the Russians became fundamental to all State propaganda. The study of Russian became mandatory in schools alongside the study of Scientific Communism in universities.

Todor Zhivkov seized the position of Party Secretary in 1954 and gradually consolidated his power, ousting the former Stalinist Prime Minister Chervenkov completely by 1956. Zhivkov would remain as Party leader until the fall of

Communism in 1989. Like other post-Stalinist regimes in Eastern Europe, he dialled down the 'red terror'. No meaningful elections were held, and the routine imprisonment and execution of dissidents continued (Tsanev, 2009). However, a more liberal economic policy, coupled with industrialisation and favourable Comecon terms, produced a notable improvement in living standards in the sixties. Thereafter, Zhivkov remained closely aligned with Moscow.[5]

As far as the topic of this thesis is concerned, Zhivkov's most fateful decision was the Revival Process. Zhvikov apparently believed that Muslims posed an existential threat to the Bulgarian nation: with birth rates among Muslims remaining consistently high, he feared that ethnic Bulgarians would soon find themselves outnumbered. In the mid-eighties, Zhivkov began a campaign of cultural assimilation. Bulgarian Muslims were forced to change their Turkish and Arabic names to Slavic ones (Avramov, 2016). This provoked protests, culminating in four terrorist attacks. Whether the attacks originated from the repressed minority, the Turkish government, or Zhivkov's security apparatus remains unknown. It is beyond doubt, however, that the violence gave Zhivkov a good excuse to engage in repressive discriminatory policies. Muslim Bulgarians were given a choice between adopting a Slavic name or being granted an exit visa to Turkey. After a tense stand-off between the Turkish and the Bulgarian army at the border, the Turkish government agreed to grant all Muslim migrants safe passage in 1989. Conservative estimates put the number of migrants at 300,000. Half of them never returned.

---

[5] He attempted to incorporate Bulgaria as a republic of the Soviet Union, a move which Khrushcev eventually vetoed. Later on, Bulgarian troops would participate in military operations in Czechoslovakia and Afghanistan alongside the Red Army.

Communism breakdown, regime change and democracy.

Zhivkov's ethnic programme was interrupted by the collapse of the Warsaw Pact. As the Soviet Union disintegrated, Zhivkov found himself isolated. The Communist party was no longer able to quell all internal dissent. On 17th November 1989, Zhivkov was relieved from his duties as leader of the Communist Party. Within a year, democratic elections had been held and the Communist constitution had been abolished. The People's Republic was no more.

Zhivkov's lengthy mandate as General Secretary had three long-term implications for Bulgarian society. Firstly, the country experienced a long, uninterrupted period of economic growth, with some of the lowest inequality rates in the world (Jackson, 1991). This brought the Communist party considerable popularity despite its repressive policies. Secondly, corruption under Zhivkov was rampant (ibid). Finally, and most critically, the sinister nationalist turn in the mid-eighties rekindled white Bulgarian supremacism, which had lain dormant for decades (Tzvetkov, 1992). The Communist government's most brutal policies were reversed quickly – after the fall of Communism, more than half of those expatriated returned and had their names restored. However, the trauma of the transfer and the dissipation of Muslims' property negatively affected minorities' views of the Bulgarian State. Moreover, that State's propaganda machine had been directed against Islam for most of the eighties: the State's artistic apparatus had been directed to depict Ottoman massacres, while history textbooks had been rewritten to define Bulgarian nationhood almost entirely in opposition to that of the Turks.

After 1990, the now-democratic Bulgarian State began transitioning to a market economy. The collapse of Comecon, exposure to foreign competition, and a foreign debt crisis plunged the country into a deep depression. The pace of economic reform was comparatively slow. The disbanding of the State security apparatus, the crippled Treasury and the opportunities for criminal enterprise generated by the Western embargo on Yugoslavia caused an unprecedented spike in organised crime (Nikolov, 1997). The Bulgarian mafia quickly gained a foothold in all levels of government (ibid). The instability eventually produced a sovereign debt crisis in 1996. Hyperinflation and the deposition of the socialist government followed.

In 1997, Ivan Kostov came to power and embarked on a capitalist reform programme. That was also the first Bulgarian government since 1989 to serve a full term. By the end of that term, a degree of stability had been attained, with the country's economy now firmly set on a capitalist track.

It is at this juncture that history becomes current affairs. For this reason, I will limit myself to three general, and largely uncontroversial, remarks about Bulgarian politics since 2001. Firstly, the country has become politically and economically stable, a tendency doubtless boosted by the promise of EU accession and its ultimate attainment in 2007. Secondly, until relatively recently, economic concerns, rather than identity politics, dominated public discourse. An abortive attempt in the early nineties aside, no significant far-right parties emerged until 2006. Finally, legislative capture is ubiquitous, with government, mass media, and popular movements widely considered to be puppets of vested interests. With its weak democratic traditions, the Bulgarian State is exceptionally vulnerable to manipulation by foreign states and domestic power mongers.

Summary

Muslims have lived in Bulgaria for centuries. Predictably, identities have often been weaponised by politicians, very often to disastrous effect for both the slavophone majority and the country's Muslim minorities. The narrative of a powerful medieval State crippled by Ottoman invasion remains extremely powerful to this day. In Bulgarian public affairs, religion plays a mostly symbolic role. Presently, the State exhibits a more-or-less stable commitment to democratic values such as freedom of expression, a free press and equality amongst men, women and different ethno-religious groups. However, ethnic tensions remain prominent in political discourse and popular sentiment.

Minorities in Bulgaria

The historical outline in the preceding section centres on the experience of whites whose native tongue is Bulgarian. My thesis is about the relationship between those people and minorities. Bulgaria has always been fairly diverse, but remarkably little is known about the history of its minorities or their attitudes to the majority. That there are few literature sources means that the historical and sociological story that follows is very sketchy. However, it is still possible to position Bulgarian minorities in relation to the majority. It is also not difficult to see the historical, social and economic causes of Bulgarian ethnic relations. To this end, I will now describe five minorities. They appear in order of population size, starting with the largest. Thus, I will begin with the Roma, then continue with the Turks, the Pomak and the Gagauz, before concluding with the Arabs. As part of my data collection, I have discussed the issues of the ban with representatives of each one of these groups.

The Roma

The Roma are notionally Bulgaria's largest majority. There are between 350,000 and 700,000 Roma currently living in Bulgaria (Bezlov et al. 2010). The Roma themselves are not a monolithic culture: within the Roma community, there are three major groups – the Kalderash, the Yerli and Romanians – as well as several minor ones. Each group is further subdivided into smaller units, depending on location and trade. Different sub-groups observe different customs and religions and they all speak different variations of the Romani language.

The Roma are nonetheless identifiable as a minority due to their language, which is Indo-Aryan rather than Slavic, and their appearance, which is subcontinental. Little is known for sure about the historical origin of the Roma people. It is nowadays accepted that their migration began in North India, likely modern-day Gujarat, and they spread all over Europe (Mastana and Papiha, 1992). The time of their arrival in Bulgaria is shrouded in mystery: the first evidence dates from the 14th century, which would coincide with the Ottoman conquest (Rochow and Matschke, 1998). However, estimates vary wildly, with some historians believing

that there were Romani settlements in Bulgaria as early as the 9th century, possibly predating Christianisation (Marushiakova and Popov, 2000).

We do not know anything about the religion of the first Romani migrants. Like elsewhere in Europe, they converted to the religions of their host countries. Since the territory of modern Bulgaria was, at various times, ruled by Muslims and Christians, there is considerable religious diversity among the modern Bulgarian Roma. Roma identity tends to attach to a traditional lifestyle: the Roma live in small, highly mobile family units. Men and women traditionally marry in their teens, with parents ordinarily exercising a high level of control over mating choices. A curious tradition still kept by the community is the bridal market, where people can bid for wives and women display themselves, accompanied by their parents and male relatives (Pamporov, 2007).

The Roma have faced extreme discrimination and vilification in Europe. The Balkans are no exception. We do not know anything about medieval Bulgarians' attitudes to the Roma. The Ottoman tax system is known to have discriminated against them. In the early Ottoman Empire, taxation was based on religious denomination: Christians paid considerably higher taxes than Muslims. Some historians speculate that this system was in place partly to provide conquered peoples with a strong incentive to convert (Tsanev, 2007). The Roma, like all the other conquered nations, converted in droves. The Ottomans nonetheless continued to tax them at the higher rate (Norris, 1993). Although the rationale was never made explicit, it is reasonable to assume that this measure might have been intended to deter the Roma from settling in the Empire.

In any case, if the Sultans had deterrence in mind when designing their tax codes, then the policy failed to achieve its objectives. The Ottoman Empire, like all empires, dismantled a great many physical borders. This enabled the Roma, whose lifestyle was nomadic, to travel great distances. The Romani settlement of Eastern Europe intensified greatly after the Ottoman Conquest (Marushiakova and Popov, 2000). Many Roma converted to Islam and became Turkicised. Other converts, especially those living in territories with a non-Muslim majority, retained their ethno-cultural identities. By 1878, when Bulgaria became independent, the Roma were one of the most prominent minorities in the country.

The Roma culture did not fit with the Third Bulgarian State's shift to industrial capitalism. Early industrialisation entails the use of labour at a fixed location. The migratory Roma were excluded from that scheme of production (Casa-Nova, 2007). In addition, although the Bulgarian State invested heavily in education, it limited itself to education in the Bulgarian language as monolingual education was common at the time. It was particularly important to Bulgarians because of the role their language had played in the struggle for liberation. The desire to create a monolingual society did, however, exclude the Roma from the newly emerging literate classes.

The Communist party, which came to power in 1945, made a concerted effort to integrate the Roma into mainstream society (Marinov 2009). If the reader recalls, prior to 1945, the Bulgarian economy had been largely agricultural. The communists embarked on a campaign of forced collectivisation, which encountered bitter resistance from the populace (Tsanev, 2009). The Roma, conversely, allied themselves with the regime: many had previously found employment in agriculture, but they did not own any land. As a result, the dismantling of capitalist property rights favoured them strongly (Marushiakova and Popov, 2000). The Communists, driven partly by a desire to enlist the Roma to their cause and partly by a Leninist aversion to racism, did much to integrate the Roma. Roma cultural organisations, newspapers, and, critically, special schools for Romani speakers, sprang up (Nuneva, 2003). After the Bulgarian economy had recovered from the switch to central planning, the communists began to invest heavily in infrastructure. The State conscripted many itinerant Roma into its Construction Corps (Konstantinov, 1997). This enabled them to acquire gainful employment, skills and settled accommodation.

Unfortunately, the economic collapse of the nineties reversed most of those gains. The early democratic State could not maintain the rule of law. It would have been ludicrous to maintain the previous level of State expenditure on infrastructure or housing. The Roma, once again, were marginalized by the market mechanism: they were turfed out of their accommodation, returned to their nomadic lifestyle, and were consequently excluded from schooling and most forms of employment. Although racial discrimination is illegal in Bulgaria, it is clear to virtually all observers that the Roma are heavily marginalized (Barrany, 2001). Many live in

unsafe ghettoes on the outskirts of major cities. The government regularly bulldozes their houses because they do not have planning permits. School attendance is poor and literacy rates are low (Bulgarian Helsinki Committee, 2018). The entry of Roma people into professional employment is so rare that exceptions are reported, with great fanfare, in the local press (Moreto.net, 2018).

The immiseration of the Roma has had two important consequences for Bulgarian society as a whole. Firstly, the Roma have not benefitted from improvements in social and economic organisation over the last century. As a result, they are highly mistrustful of official authority and prefer to operate a parallel juridico-political system (Leeson, 2013). Consequently, the Roma are excluded from the State's governance institutions: despite forming the largest minority in the country, they have never had a parliamentary party, nor do they have a voice in any major political debates. Secondly, the abject poverty in which most Roma live, coupled with their understandable contempt of formal institutions, has made them vulnerable to all kinds of subversion. It is well-known and widely accepted that the major parties buy Roma votes at elections (Barany, 2001). The Bulgarian majority, like most majorities, cares little for the structural causes of that tendency, and they tend to meet Romani social movements with outright aversion.

Turks

Bulgaria has a large Turkish population. At the last census, held in 2011, 588,318 identified as Turkish (National Statistical Institute, 2011), with that number likely to have declined slightly owing to migration within the European Union. Turkish people, unlike the Roma, are not sub-divided into groups. In fact, they are largely integrated into Bulgarian society. Most, but not all, speak Bulgarian, and many have Slavonic names, for reasons that I will return to shortly (Küçükcan, 1999). There are also strong genetic similarities between Bulgarians and Turks: the ancient Bulgars were a Turkic tribe and interbreeding has been occurring at a low but constant rate since the fourteenth century.

Most Bulgarian Turks speak Turkish between themselves, and most observe some Muslim rites, usually in the Sunni tradition (Baeva and Kalinova, 2009). It is

widely accepted that large-scale Turkish migration to Bulgaria began at the end of the fourteenth century, after the Ottoman Empire's conquest of the Second Bulgarian Empire in 1396. There is some evidence to suggest that a smaller migration may have taken place in the ninth century.[6] In any event, the Ottoman migrants vastly outnumbered those Turks who may have come before them.

Turkish migration to the Balkans was rapid and massive. The early Ottomans had been nomadic. As the territory under their control expanded, they began to realise large economic surpluses from stationary occupations, such as farming and artisanship (Howard, 2017). This made settlement more desirable. The dramatic territorial gains that the Ottomans made in the fourteenth century in turn provided a seemingly-infinite supply of land. Thus, large numbers of Turks settled down in modern-day Bulgaria, then an Ottoman province.

There were two further pressures that explain the Ottoman settlement of the Balkans. Firstly, the unreformed Ottoman administration was inefficient. However, the Ottoman government needed to collect taxes in full to fund military expeditions. That bureaucracy, which appears to have been considerably overstaffed, also settled down in Bulgaria and began administering the province (Stanev, 1935). Finally, the pace of Ottoman expansion was so lively that most of the Empire's population was unassimilated and hostile to the new regime. To counteract the possibility of rear-guard rebellions, the Ottomans would routinely force large populations to move to regions of the country that were far removed from their homeland (Norris, 1993). Many Anatolians found themselves transferred to the Balkans, where they remained in perpetuity.

The Turkish population continued to increase until the Russo-Turkish War of 1878. During the war, the Russians and the Bulgarians massacred many Turks, forcing others to relocate to the Turkish heartland to await the restoration of order and justice. Many Bulgarians moved into the now-vacant land and began working it for profit. Once the hostilities ended, Bulgaria found itself divided into two: the southern part remained partly under Ottoman control, whereas the North was

---

[6] This is discussed at somewhat greater length in the section on Pomaks, below.

incorporated as the Principality of Bulgaria. Both States promptly passed laws that restored land ownership to pre-1878 owners, chiefly Turks who had fled. However, in both North and South, the laws were enforced poorly. Most Turkish landowners failed to recover their land. With that, their incentive to remain in Bulgaria – where Turks were met with extreme hostility – diminished, and the Turkish population declined (Madzharov, 2015).

The censuses of the time show that, in 1900, there were still 531,240 Turks in Bulgaria, accounting for some 14.2% of the population (National Statistical Institute, 2011). Their numbers declined further during the Balkan Wars and the First World War, and only began picking up around 1926. Since then, Turks have accounted for between eight and eleven percent of the total population of the country (ibid).

The early Communist government adopted a policy of integration (Marinov 2009). Turks were admitted to universities preferentially. The Turkish language was promoted, with generous government subsidies for Turkish newspapers and Turkish cultural organisations. As noted in Section 6, the State's policy on the Turkish minority became extremely hostile in the mid-eighties. Zhivkov was driven by demographic concerns: he is believed to have thought that Turks would soon outnumber Bulgarians. He then began a campaign of compulsory assimilation, in which Turks were forced to adopt Slavic names, the use of the Turkish language in public was effectively outlawed, and Turks who did not volunteer into the scheme were denied identity papers, effectively displacing them from labour and housing. The backlash – which may have been orchestrated by the Secret Service – was violent, and impelled Zhivkov to force Turks to leave their homes and migrate to Turkey.

Zhivkov's regime collapsed soon after, and many Bulgarian Turks returned. The Turks were also permitted to revert to their original names. The regime change thwarted the attempted annihilation of Bulgaro-Turkish culture. However, the Revival Process did have a lasting impact. Turks became very mistrustful of Bulgarian politics (Elchinova, 2005). As the interviews that are presented later reveal, many Turks still use 'official' Bulgarian names, with a view to avoiding potential future persecution. In addition, it is apparently common practice to give

Turkish children two names: one official and Slavonic, which is used in identity documents; and another Turkish name, which is used in private.

Post-communist Bulgaria avoided the ethnic strife that ultimately caused the disintegration of neighbouring Yugoslavia. The Turkish, who are politically very well organised, have escaped persecution. It is uncommon – although not unheard of – for Turks to be denied employment or accommodation because of their ethnicity, which is in contrast with how Roma are routinely treated. In a controversial and largely symbolic gesture, the Bulgarian National Television broadcasts news in Turkish every day. Overall, the ethnic peace has been maintained reasonably well.

This is not to say that the Turkish minority is politically irrelevant, or that modern Bulgarian society is perfectly accommodating to the Turkish. There are two tendencies at play. Firstly, the mainstream narrative of Bulgarian history is completely dominated by the Ottoman conquest of 1396 and the subsequent annexation of Bulgaria into the Empire. It is a commonly held view that most of modern Bulgaria's issues are directly attributable to the conquest. That inference finds ample support in works of art, both popular and elitist, most produced contemporaneously to liberation in 1878. The emergent far-right parties make ample use of that symbolism. That strategy appears to have been partly successful: since 2008, nationalists have regularly managed to secure around a tenth of the vote.

Secondly, Turkish voters predominantly vote for the DPS (Baeva and Kalinova, 2009).[7] Since the 1990 constitution banned ethnic parties, DPS is not, at least in formal terms, a Turkish minority party – a small part of its cadre comprises ethnic Bulgarians. However, it is undeniable that DPS is seen as a minority party by both the Turks who vote for it and the many Bulgarians who oppose it. DPS has a poor reputation among the non-Turkish population. It coalesces with parties of all colours. As a result, it is in government most of the time. Like other Bulgarian parties, it is widely perceived to promote vested interests. That perception, coupled

---

[7] *Dvizhenie za prava i svobodi* [Movement for Rights and Liberties]

with its consistent electoral returns, have made it a popular target for far-right parties and nationalist voters.

Pomaks

We now turn to a somewhat smaller minority, that of the Pomaks. The Pomaks are slavophone Muslims. Part of the indigenous population of Bulgaria, they appear to have converted to Islam at some point after the Ottoman conquest. The modern-day Pomak population is largely concentrated in the Rhodopes, a mountain range in the Western part of the country. Their exact number is unknown. In the most recent census, no respondents stated that they were Pomaks. Most Pomaks do not identify as such. Instead, when asked, they define themselves as Bulgarians ethnically and as Muslims religiously. The term 'Pomak' is commonly used by non-Pomaks to denote Bulgarian converts to Islam. In general, it is accepted that they do not form an electorally significant minority – the Rhodopes are a poor, sparsely populated area (Cholov, 2008).

Since so little is known about the Pomaks today, their origin is a matter of speculation. The mainstream theory, championed by various nationalist governments, is that the Pomaks converted to Islam on pain of death shortly after the Ottoman Conquest (Eminov, 2000). There is little evidence to suggest that the Ottoman Empire engaged in mass forced conversion after conquering the Balkans. The hypothesis does not cohere with the modus operandi of the Ottomans in other conquered territory, nor is there any cogent explanation of the differential treatment apparently afforded to the Rhodopes.

There are three alternative theories. All of them have failed to penetrate Bulgarian public discourse. The first is that the disillusioned Bogomils who believed in a dualist cosmogony where Satan and Jesus are equal rivals, converted readily to Islam as they were marginalized for centuries. If this is correct, then the Ottomans did in fact supply a strong incentive to convert, but without resorting to direct force.

The second theory reviews Islamisation of the Rhodopes followed the Chiprovtsi Uprising (ibid). That uprising, which took place in 1688, was led by Bulgarian Catholics, who were likely attempting to assist Austria and Poland in their post-

Vienna military efforts against the Ottomans. The rebellion was unsuccessful, and the Ottomans appear to have expelled most Catholics.

Lastly, some scholars have advanced an economic rationale for mass conversions in the Rhodopes. During the seventeenth century, the Ottoman Empire's territorial expansion ground to a halt. It was no longer possible to sustain the empire through conquest, and as a result the Sultans increased the *ji*zyah – the tax levied on non-Muslim subjects – tenfold. As a result, to avoid the crushing tax, many non-Muslims converted to Islam (Norris, 1993). This explanation is in line with better-documented developments elsewhere in the Balkans, such as those in modern-day Albania and Bosnia. However, it remains unclear why the proportion of converts in the Rhodopes was significantly higher than that observed in other parts of Bulgaria. Some historians speculate that the large-scale conversions in the Rhodopes resulted from a military campaign against local rebels (Tsanev, 2007).

Whatever their origin, the Pomaks developed a culture that exhibits notable variance from the Bulgarian mainstream. Although they remained Bulgarian in language and dress, they practiced Islam. This pitted them against the nationalist governments of post-liberation Bulgaria. Between 1877 and 1886, the Pomaks founded the Republic of Tamrash (Tsanev, 2008). After Bulgarian reunification in 1886, the republic was quickly and forcefully reincorporated into the new ulgarian State. A second attempt at secession took place during the Balkan Wars. Its ultimate suppression led large numbers of Pomaks to disperse around the Balkans. Nowadays, large slavophone Muslim populations live in Turkey, Macedonia and Greece (ibid). The community dealt with another blow during the Revival Process as Zhivkov's programme circled on the Rhodopes. The Communist government initiated forced removals of Pomak and Turkish families to the north of the country. The aim was to prevent strengthened clan relationships (Gruev, 2011). Hence, many families were separated by force and in the northern areas of Bulgaria there are still descendants of the removed Turkish and Pomak families. Some chose to abandon the country; others obeyed the renaming process and the internal resettlement. Thus, many slavophone Muslims changed their names, moved across Bulgaria, and others migrated to Turkey.

These events have left the Pomak community marginalized. Pomak villages in the Rhodopes are among the poorest in Bulgaria, with incomes considerably lower than the national average (NSI, 2005). Migration to urban centres has left the region severely under-populated and largely unindustrialised. The remaining inhabitants are heavily dependent on tobacco crops for their survival. Since the Bulgarian tobacco industry depends on government subsidies, the Rhodope vote is in practice reserved for DPS, which has the financial backing of the country's tobacco monopolist, Bulgartabak (Vaglenov, 2008).

Gagauz

The Pomak community in the far West of Bulgaria is mirrored by the Gagauz, who mostly live by the Black Sea coast in the easternmost part of the country. The Gagauz are Turkophone Christians. Although their traditional language is Turkic, the Gagauz do not appear to have any spiritual or historical ties to Islam (Eminov, 2007). Their folklore shows no evidence of Anatolian influence (Marinov, 1964). Nowadays, the Gagauz minority has largely been assimilated into the Bulgarian majority – virtually all Gagauz individuals speak Bulgarian and identify strongly with their Bulgarian ethnicity and the Bulgarian State.

It is unclear why the Gagauz speak a Turkic language. One well-supported hypothesis is that they are simply descendants of the Bulgars, who formed the first Bulgarian State alongside the Slavs (Miletic, 1902). The Bulgars were a Turkic tribe and they spoke a Turkic language. Their major settlements in Bulgaria were all in Eastern Bulgaria, making it likely that a sufficiently large population eventually settled by the Black Sea and retained its language. Another theory proposes that the Gagauz were initially Muslim or pagan and as they settled in Bulgaria, they retained their language but converted to Christianity in line with the country's mandatory religious policy (Tonev, 1995). An alternative theory, which is somewhat more politically charged, is that the Gagauz were originally slavophone, but found themselves forced to begin speaking Turkish at some point after the Ottoman Conquest (Marinov, 1964). Although that conjecture dominated Bulgarian historiography throughout the twentieth century, like most of the theories surrounding the Pomaks, it fails to account for why the Ottomans did not

press for the same policy in other parts of conquered Bulgaria. An interesting, albeit outdated, feature of Gagauz cultural expression is the wearing of a white face-veil that seems to have been popular amongst Gagauz women in the 19th and 20th centuries (Tonev, 1995). Additionally, albeit Christian, the Gagauz are interesting in their tendency to intermarry with both Bulgarian majority and Turkish minority people (Marinov, 1988).

The modern Gagauz identify almost completely with the Bulgarian majority. This appears to have been the case for most of Bulgarian history: historians have proven unable to locate mentions of the ethnonym that predate 1861. There were no reprisals against the Gagauz after the liberation of the Ottoman yoke, nor did they ever pursue secession or independence. Indeed, the Gagauz community appears to have expended a great deal of energy to dispel the view that they are separate from the Bulgarian majority. With the linguistic difference nowadays fading away, it appears that the process of assimilation (or re-assimilation) is near-complete.

Arabs

In the tapestry of Muslim groups, there is also a small Arab minority in Bulgaria. After the 1960s, many Arabic students migrated to enrol in higher education programmes, and some of them settled in the country (Krasteva, 2005). Up until 2006, the Arabic community consisted of 20,000 people (Krasteva, 2006). However, after the Arab Spring and the mass migration to Europe, the estimates of legally settled Arabs vary, and some remain unregistered, while others move on to Western Europe (Anev, 2017). The Arabs are immediately identifiable as a minority, since they differ from the Bulgarian majority in appearance, language and religion. Contact between Arabs and Bulgarians is not, however, a recent development. The two ethnicities came into contact as early as the seventh century (Norris, 1993). Contemporaneously to the Slavonic settlement of the Balkans, the Byzantine Empire was waging a series of wars in the Middle East. It recruited large numbers of Slavonic soldiers, many of whom defected to the Arab side once in the Middle East. Thus, Arabs appear regularly in Bulgarian folk tales that predate the Ottoman Conquest, and the two civilisations were in near-constant contact between the Middle Ages and modernity.

The bulk of Arab migrants to Bulgaria arrived during the sixties. At that time, many Arabic states were aligned with the USSR and the Warsaw Pact. Bulgarian universities offered favourable terms of admission to Arabic students, and many moved to the country to study (Krasteva, 2006). A large number stayed in the country after completing their studies. Refugees fleeing the war in Syria have also entered Bulgaria, in numbers that are unknown but presumed to be significant. Bulgaria borders Turkey to the East, meaning that it is an important transit country in the refugees' path to Western Europe. Comparatively few refugees have settled in Bulgaria compared with the number who have passed through it. This notwithstanding, the refugee crisis has stoked political tensions which mimic those in Hungary and Poland in tenor but not in magnitude. Far-right parties have sought to portray Syrian refugees as an existential hreat to Bulgarians. The burqa ban may well be conceptualised as a part of that broader campaign. Unlike in Central Europe, however, the far-right has failed to capitalise electorally on the perceived refugee threat.

Conclusion

To summarise, I began with an overview of Bulgarian history. Bulgaria was founded in 681 and became Christian towards the end of the ninth century. The medieval Bulgarian State was eventually conquered by the Ottoman Empire, which administered it with varying degrees of success between 1396 and 1878. Liberation triggered a series of wars, with nationalist sentiment on the rise. After Bulgaria's defeat in World War Two, a communist government came to power. In the fifties and sixties, that government made active efforts to integrate minorities – including Muslims and the Roma – into mainstream Bulgarian society. Those attempts were moderately successful. However, a disastrous campaign of forced slavisation, and eventually expulsion, strained relations between Muslims and the Bulgarian State.

I then moved on to describe four of the main Muslim minorities in Bulgaria, whose respective representatives I interviewed as part of my research. The Roma and the Turks are by far the most numerous. The Roma are politically unorganised, suffer high degrees of discrimination and, for the most part, live in abject poverty. The

Turks, whose electoral significance is considerably higher, face comparatively less discrimination. The Pomaks and the Gagauz are largely ignored in mainstream political discourse, yet they are populous minorities who are mostly employed in agriculture in both South and North Bulgaria. Arabs have commanded more attention in recent years, largely as a result of a far-right, anti-refugee campaign which appears to be winding down at the time of writing. This historical account gives some context to the analysis of identity issues that follows later in the thesis. I will now turn my attention to legislative procedure in Bulgaria as well as the details surrounding the passage of the face-veiling legislation. I believe that this chapter will contribute to the reader's understanding of the political discourses surrounding the face-veil legislation and the marginalization dynamics that accompany it.

Chapter 3 : Legislative process in Bulgaria and passage of the face-veiling legislation

The present chapter aims to provide an account of the anti-veiling legislation in Bulgaria, whereby setting up the legal contextual scene of my research. In order to build the Bulgarian case, I will focus on the general rules and regulations surrounding the legislative process; in addition, the chapter will provide details about the passage of the anti-veiling legislation. In order to explore the procedures and mechanisms of adopting new legislation, it is necessary to consider the postulates of the Bulgarian Constitution, where institutions and their competencies are established. Furthermore, I will delve into the specifics of the legislation banning face-veiling, which was adopted in 2016. To aid this presentation, I will also attempt to review the stages of passage of the face-veiling bill. In addition, I will scrutinise the parliamentary discussions relating to the face-veiling ban. I aspire to adopt a factual reporting technique for this chapter as the details of the legislative process and the events that surround the face-veil ban are indeed heavily factual.

The chapter is structured as follows: firstly, a summary of the legislative process in the Republic of Bulgaria is laid down. This will serve as a general platform to inform the reader of the decision-making processes and steps entailing the adoption of each new legislative act. Secondly, this chapter will attempt to delve into the specifics of the face-veiling legislation – its promoters, opponents and the purpose it is acclaimed to serve. These goals will be achieved by reviewing reports made by parliamentary committees as well as interesting statements put forward during parliamentary discussions of the bill. In addition, I will present quotations of the key sections of the legislation. Finally, I will conclude with a discussion and a list of references.

Legislative process in Bulgaria. Parliamentary (national) and County Council (regional) legislation. Face-veiling bylaws in Bulgaria

The present section aims at revealing the antecedents as well as the effects of the face veiling legislation in Bulgaria. The legislation is currently embodied in a statutory act. However, before the act was passed, anti-veiling was regulated by County Councils via delegated legislation. The first aim of the present chapter is a review of the predecessors of anti-veiling legislation in Bulgaria; and to achieve this aim, the paper will firstly provide a review of Bulgarian bylaws – procedures, competence of the relevant institutions and the limitations of bylaws. Secondly, the paper will examine the history and particularities of bylaws concerning face veiling.

With regards to the second aim, the effects of the face-veiling legislation, the paper will attempt to provide a factual account of its implementation and enforcement. To serve this purpose, data and facts regarding bylaw enforcement will be scrutinised, as well as details about the enforcement of the statutory act banning face veiling. In addition, the paper will delve into the network of institutions responsible for enforcing the law. Mapping the institutions and actors within whose discretion the application of the legislation lies is quintessential to understanding law enforcement

County Councils in Bulgaria

County Councils are autonomous governance structures: they do not form part of the Bulgarian executive or the legislature (Drumeva, 2013). The County Councils are local organs of representation of General Competence – or the English equivalent: General Power of Competence (HOC, 2011). General Competence simply means, County Councils can do anything an individual can such as participating in businesses which may regenerate local economies (Drumeva, 2013).

County Council legislative competencies. Bylaws: County Council regulations
By-laws in Bulgaria are a form of delegated legislation. The Parliament is the supreme legislative force and holds absolute authority over primary legislation –

such as statutory acts. However, for issues of local character, it is acceptable for County Councils to adopt delegated legislation, or by-laws to tackle emerging issues that do not have a national character. The Constitution and a number of Acts of Parliament allow for the delegation of the issuance of subsidiary legislation to the Council of Ministers, the Ministers themselves, or to Mayors and County Councils. Those delegated legislator instruments are decrees, regulations, ordinances and instructions and thus regulates of specific areas of economic or social activity (S76(3), Code of Administrative Procedure, 2006). If such subordinate statutory instruments contravene an Act of Parliament or the Constitution, they can be appealed before (and possibly revoked by) the Supreme Administrative Court.

Depending on the scope and nature of the County Council regulation, it is possible to draft and discuss more than two versions. After discussion, the sponsor enters the necessary corrections and presents it to the organ which is responsible for its preparation. Before the submission of the draft legislation to the competent organ, the sponsor publicises it on the website of the institution, along with justification. The report, with interested parties given at least 14 days to make recommendations or state their position. The competent organ issues the legislation after discussing the reports, statements of position, and any objections. The draft legislation, along with the motivation and the report, are submitted for discussion and passage to the competent organ. The motivation and the report must always contain the reasons which necessitate its passage, the intended outcomes, a statement of the financial means necessary for the implementation of the new legislation, the expected results of its implementation, as well as any financial results, if applicable. A draft which contains no motivation, resp. report, is not discussed by the competent organ.

The structure and text of the legislation must conform to Regulation No 883 of the application of the Legislation Act (1973). The provisions of the legislation must be formulated in common Bulgarian, concisely, precisely, and accurately. All County Council legislation must bear a name which specifies its type, the author, and its subject matter. Council of Ministers decisions, regulations and ordinances also have numbers. All legislation must state the legal basis for its passage, except for

legislation which amends or repeals other legislation. Delegated or secondary legislation may be repealed or amended through explicit provisions in subsequent legislation.

General provisions precede specific ones. The content of a piece of legislation and its lawful passage are authorised by the organ of passage. When the organ in question is collective, authorisation is by its Chair. Legislation is published in the State Gazette, which is deemed to have been published on the day in which its circulation begins. When the legislation enters into force within some period of time after its publication, the day of publication does not count for the purposes of determining the date of entry into force.

Face-veiling bylaws

After drawing out the responsibilities and prerogatives of County Councils as well as the procedure of passing regulations, I will turn my attention to the passage of the face-veiling bylaws. The first County Council to restrict face-veiling was the one in the city of Pazardzhik. Pazardzhik was the first city where autochthonous (native) Muslims adopted face-veiling (Newsbg, 2016). The first piece of legislation to regulate the wearing of a face veil is a bylaw issued by the Pazarzhik County Council. The present section will explore this piece of subsidiary legislation. Firstly, I will present a short section on the city of Pazardzhik – its demographics and current political forces active in the city. The background information for the city of Pazardzhik will serve to orient the reader to the social dynamics in the Pazardzhik municipality.

Despite the realisation that such an overview will merely scratch the surface of social complexity bubbling in the area, I find that sketching the area's features is crucial. Albeit in a caricature form, background review is important to inform the reader about the specifics of the Pazardzhik municipality. Thereafter, I will focus on the actors who proposed the by-law. This step is crucial as legislation often serves political goals. Identifying the key actors pushing for this legislation will illuminate the viewpoints adopted by these actors. Similarly, such review will allow for a deeper scrutiny of hidden assumptions and assertions that may have been

present when the document was drafted and subsequently completed. Thereafter, I will attempt to summarise the content of the regulation and identify key points present in it.

The city of Pazardzhik

This section contains information regarding Pazardzhik, primarily sourced from the website of the city's County Council (https://pazardzhik.bg/). Pazardzhik is a city in Southern Bulgaria. The word "pazardzhik" derives from the Persian "bazar" (market), to which the Turkic suffix "cik" (small) is added. The city was founded by the Tatars in 1485. It grew into an administrative centre, a position which it has since retained. The city was successfully sieged by the Russians during the Russo-Turkish Wars of 1806-1812 and 1877-8. In the course of the latter war, the retreating Turkish forces were intent on scorching the city, but ultimately abandoned the plan. At the time, Pazardzhik had a sizable population and hosted two annual fairs, a market, a post office, a cultural centre and a school.

In the twentieth century, Pazardzhik industrialised rapidly. Its population peaked at 80,000 in 1992. Following the transition to a market economy, its population declined to around 70,000, with 115,000 living in the wider Pazardzhik Muncipality. In 1865, Bulgarians amounted to 57% of the population and Turks to 28.5%. By way of comparison, 86% of respondents to the 2011 census survey identified as Bulgarian, 7.3% as Turks, 5.2% as Romani, 1.2% as others, with 7.8% refusing to declare. In other words, since the majority of Turks and Romani people are Muslims, it may be approximated that the Pazardzhik Municipality has a population of at least 13% Muslims (Pazardzhik County Council website).

The first face-veiling ban: Public Order Ordinance of Pazardzhik County Council

The first act to regulate face-veiling was adopted by the Pazardzhik County Council. The prohibition to cover one's face is incorporated into an ordinance. The pre-existing Public Order Ordinance was amended based on the proposition put forward by members of the National Front for Salvation of Bulgaria (NFSB). As of now, NFSB has joined forces with the two other prolific right-wing parties: ATAKA,

and IMRO (Internal Macedonian Revolutionary Organization) under the common name of United Patriots. They are part of the current government and form a coalition with the leading Party. Below, I report on the motives presented in the proposed regulation amendments and the measures envisioned to enforce it. The motives are an annex to a legislative document – be in a law or an ordinance and they contain the reasoning and moral justifications of the legislation authors.

In their letter to the Chairperson of the County Council, the steering group behind the regulation expressed a concern that there had recently emerged a novel tendency in the Pazardzhik Municipality: some of the citizens were wearing clothes that concealed parts, or all, of their faces. To quote directly from the ordinance: 'Concealing one's face in a public space is incompatible with our social norms and undermines citizens' perception of safety' (Proposition for Public Order Ordinance, Pazardzhik Municipality No 61/27.04.2016).

According to the United Patriots, the face plays an important role in human interaction. More than any other part of the body, the face expresses the existence of an individual as a unique person and influences their interaction with others. Concealing one's face is liable to result in the termination of most social connections and provides physical and psychological barriers to communication. It is unacceptable to deny the possibility of interpersonal communication so fundamentally in a public space (Proposition for Public Order Ordinance, Pazardzhik Municipality No 61/27.04.2016). According to the proponents of the ordinance, the barriers erected against others through the concealment of one's face ought to be construed as a violation against the right of others to inhabit social space, which makes coexistence easier.

 In the motives attached to the ordinance(Proposition for Public Order Ordinance, Pazardzhik Municipality No 61/27.04.2016), the United Patriots affirm that:

> "the norms of comportment which predominate in our societies are the product of a social consensus and a compromise between individuals and social cooperation norms. Individuals who wear clothes that obscure their faces signal that they do not want to participate in social life and to integrate into the society of the Bulgarian Republic."

Next, the motives make clear that identification of individuals aims to prevent crime and to safeguard persons and property, as well as to deter those who may wish to assume a false identity or to commit crimes. In light of the upsurge in violence and terrorism, the impossibility of identifying certain persons was said to imperil the safety and comfort of ordinary members of society.

According to the sponsors of the amendment, in a democratic society, the interests of national security, territorial integrity, public safety, the prevention of crime and riots, as well as the protection of health, morals, and reputation, dictate that it must be possible for every member of society to be identifiable by his or her fellow citizens and the organs of State, as well as by local authorities. Last but not least, according to the United Patriots, by amending the Public Order Ordinance, Pazardzhik County Council would clearly signal that it does not intend to be an impassive observer of the processes which are underway in the municipality and which affect the future of the community. By those 'processes' the United Patriots mean the practice of face-veiling adopted by some Muslim women in the municipality.

The motives attached to the Pazardzhik Ordinance offer the aims of its authors: to guarantee the safety of persons and property; ensure compliance with social norms and the safeguarding of peace, health, and life; as well as the incentivisation of integration processes, as opposed to dividing the citizenry and causing the fomentation of religious and ethnic strife. The implementation of the amendments proposed by the United Patriots does not necessitate the provision of funds from the Council's budget. The proposed amendments of the existing ordinance are reported to relate to secondary legislation and were designed to comply with the European Charter of Local Self-Government. As reported, the amendments do not contravene primary legislation, EU law or the European Convention on Human Rights.

According to the motives, the proposed amendments comply with Judgment No 43835/11 of the European Court of Human Rights: a French woman wearing a niqab failed to contest the face-veiling ban in France. Texts which mirror the proposed amendments have been enacted in the legislation of leading European

countries, such as France and Belgium. Specifically, Pazardzhik County Council amended the Public Order Regulation of Pazardzhik County Council as follows: A new sub-section 43 was added to Section 2:

> "(43) wearing garments or parts of garments which conceal, in part or in full, the face and/or which prevent the identification of individuals by citizens, organs of the State or technical means, in a public place. Such garments shall include all garments or parts thereof which conceal, partly or in full, the face in contravention of Point 12, Appendix 5, of the Bulgarian Identity Documents Regulation."

The prohibition applies in cases of transit, carriage or use of a vehicle, when the vehicle is on a street or in another publicly accessible place. The prohibition does not apply to instances where the garments are necessary for protection, or if the garment is intended to protect the face in the course of professional activities which require the use of protective clothing pursuant to the Labour Code and the related secondary legislation, nor to clothes designed to protect a person from the effects of cold weather if worn by persons under the age of 14, when the external temperature in the territory of their place of residence is under 0 degrees Celsius." (Proposition for Public Order Ordinance, Pazardzhik Municipality No 61/27.04.2016). The Public Order Regulation of Pazardzhik County Council also included penal mechanisms to ensure compliance. New Sections 69a and 69b were added, as follows:

> "S 69a. A person guilty of an offence under Article 2(43) shall be liable to a fine of 500 leva, with second and further offences triggering a sanction in the amount of 1000 leva.
> S 69b. 1. A person who permits persons in apparel that contravenes Article 2(43) of the present Ordinance to access the territory of a public space which he or she manages or for which he or she is responsible, inclusive of hospitality venues, shops, as well as carriage or use of a vehicle in a public place, shall be liable to a fine of 1000 leva, with second and further offences triggering a fine of 2000 leva.
> 2. If the offender is a juridical person, the first offence triggers a proprietary sanction of 5 000 leva, with second and further offences triggering sanctions of 10 000 leva.
> In all cases of violations, the Council shall revoke all permits and licences for the conduct of certain activities from the offender, as well as terminating leases for properties which the Council owns and which the offender has leased or otherwise uses, for reason of an offence under the present Ordinance." (Pazardzhik County Council, 2016)

Stara Zagora, Sliven and Burgas County Councils Public Order Ordinances

This section will provide a quick overview of the amended new Public Order Ordinances in three other Bulgarian cities. Similar to Pazardzhik, the other Ordinances were amended to incorporate new provisions banning the concealment of the face. In all instances the members of the United Patriots party championed the campaigns of legislative changes.

The County Council of Sliven was next to follow Pazardzhik in the face-veiling ban campaign. The proposed bylaw was initiated by members of the Patriotic Front in partnership with GERB – the senior party in the current Coalition Government of Bulgaria. Similarly, to Pazardzhik, the face-veiling ban was introduced through an amendment of the existing Public Order Regulation. However, the text of the proposed amendments does not contain motives or justifications, unlike the Pazardzhik regulation. The Public Order Ordinance contains general notes about the prohibition of face-veiling:

> "S 13. It is hereby forbidden to:
> 1. Express religious convictions as a representative of a religion and/or a religious community not registered pursuant to the Religion Act.
> 2. Use technical means which, through the use of sound, symbols or imagery, disrupt the peace and common morality or which disturb the citizenry.
>
> S 14.
> 1. The wearing of religious garments which cover the face in a manner which obstructs the identification of the wearer is hereby prohibited in all public places.
> 2. The prohibition in sub-section 1 does not apply to persons engaged in professional duties pursuant to the Ministry of Internal Affairs Act, the State Agency for National Security Act and the Defence and Armed Forces Act."

(Public Order Ordinance, Sliven Municipality (No 231/26.05.2016)

Burgas County Council Public Order Ordinance

Like its predecessors, the Burgas Public Order Ordinance does not contain motives or justifications, simply the amended text. The proposition for amendment is not available on the website of the County Council (https://burgascouncil.org/naredbi-pavilnitsi). The new provisions containing a ban on face-veiling are as follows:

> "S 4a.(1) It is hereby forbidden to:
> 1. Wear garments that fully or partially cover the face.
> 2. Associate with religious faiths that are not registered in the Bulgarian Register of Faiths and Religions, including those faiths that are in stark contrast with Bulgarian moral and ethics.
>
> (2) The prohibition in sub-section 1 covers institutions and official buildings where administrative, educational and social services take place, as well as places for relaxation, sport, cultural events and communications.
>
> (3) The prohibition in sub-section 1 does not apply to persons engaged in professional duties or when the garments are required for health and safety reasons or for events with temporary character.
>
> (4) Registered faiths cannot use psychotropic substances or substances altering the consciousness in their rituals" (Public Order Ordinance, Burgas Municipality No 12802/28.11.2016).

National legislation banning face-veiling. The Act Limiting Garments Partially or Fully Covering the Face

Following the several public ordinances discussed in the previous sections, Parliament passed national legislation in the autumn of 2016. The national legislation prohibits the covering of the face in a public place anywhere within the territory of Bulgaria and this section will discuss its content and passage in depth. The legislation was titled 'the Act Limiting Garments Partially or Fully Covering the Face (2016)' (as of now abbreviated as –'the Act'). The following text is an exert from the Act:

> "S2(1) Clothing fully or partially covering the face is not allowed in public spaces on the territory of the Republic of Bulgaria

S2(2) A public space as mentioned in S2(1), is any socially accessible place on the territory of the Republic of Bulgaria.

S3. S(2) does not apply when:

1. If the clothing is necessary for
   a. Health-related reasons
   b. Professional activities
   c. As part of the sport, cultural, educational and so on events, when the clothing is worn by participants of the event and the event is of a temporary character.
2. In prayer houses of registered faiths.
3. In cases defined by other statutory acts.

S5. Control over the application of this act is exercised by the organs of Ministry of internal affairs. (Police, penal organs).

S6. - Punishment: administrative. a fine; 500 lv and 2000 lv for the second offence. The instigators and endorsers will be fined correspondingly."

(Bulgarian Parliament, 2016)

Clearly, the last section postulates that the punishment is a fine. Interestingly, the Government's response to the Covid-19 pandemic resulted in a conflicting norm. The Minister of Health Kiril Ananiev issued an ordinance No 01-197/11.04.2020 that mandates that wearing a face mask is mandatory in public spaces. The ordinance states as follows:

"Any person who enters open or closed public spaces (this includes public transport, shops, parks, religious buildings, streets, bus stops etc) are obliged to wear a protective mask or any other material that covers the nose and the mouth (including a veil or a scarf)... "

Ananiev (2020)

Compliance with the ordinances of the Minister of Health is ensured by an administrative penalty between 300 and 1000 lv for first and between 1000 and 2000 lv for repeated offence (Act of Health, 2005). This ministerial ordinance was bound by a timeline of three weeks. This means that between 12 and 24 April 2020 refusing to cover one's face and nose was illegal. Some legal practitioners have spotted the legal collision between the face-veil ban and the ministerial ordinance (Rashkov, 2020; Petkova, 2020). To these comments, the Government responded

that in a state of emergency, some national legislation can be surpassed for the period of dealing with the crisis. After a summer with relatively relaxed anti-covid-19 measures and a resurge of cases, a consecutive Minister of Health, Dr Kostadin Angelov issued a new ordinance No 01-609/ 21.10.2020 on 22 October (Angelov, 2020). It once again, enforces the mandatory covering of the face for the period between 22 October and 30 November. No person since April has been reported to be fined under the face-veil ban. Many others, however, have been fined for failing to comply with the ministerial ordinance (Duma, 2020).

Administrative violations

Wearing a face-veil (as well as not covering one's face when a Minister has ordered it) constitutes an administrative violation under Bulgarian law and this is postulated in the Act Limiting Garments Partially or Fully Covering the Face (Bulgarian Parliament, 2016). Hence, it would be meaningful and useful to inform the reader of the nature of administrative violations as well as the procedure envisioned in legislation regarding administrative offences. Administrative violations are codified in The Administrative Code of Bulgaria (2006) and in The Administrative Violations and Penalties Act (1999). Administrative violations are acts against the governance of the State. To secure a conviction, the State must establish fault, that is, it must be shown that the violator exhibited a certain psychic attitude to her own behaviour and its consequences (Dimitrov, 1991). The violation must also be enforceable by means of administrative penalty (Dimitrov, 1991).

According to Hrusanov et al (2012), administrative violations have two components. The first is objective: there are externally verifiable factors which indicate sanctionability. The sanctionability condition must refer to an act or an omission. The act must be unlawful, that is, it must contravene a specific administrative-law measure. The State must also establish harm: the defendant's actions must be capable of impairing the proper governance of the State. Finally, the act must be sanctionable and the penalty must be of a kind that an agency of the State can administer.

The second component is subjective. The State must show intent. To be liable, the defendant must have been cognisant of the violation and its consequences. It must also be shown that she had those consequences in contemplation, direct or indirect. Hrusanov et al (2012) argue that, alternatively, it is possible to found liability in negligence – liability accrues where a reasonable person in the defendant's position would have averted the consequences of the defendant's action, irrespective of whether the defendant himself was subjectively aware of those consequences. Negligence, thus defined, captures both behaviour that falls below the standard of care and recklessness. It is a central principle of administrative law that there is no liability without fault (Dimitrov, 1991). To succeed, the State must establish that all subjective and objective requirements are fulfilled. The absence of any one component of a violation precludes a finding of fault. There are no inchoate administrative violations. Remedial measures may only be imposed to prevent or terminate an administrative violation.

Sanctions

An administrative penalty is a sanction that the State imposes on those who commit administrative violations (Dimitrov, 1991). The violator is compelled to suffer some harm, material or otherwise. The penalty is intended to exert a deterrent influence on the violator and other members of society.

There are four kinds of penalties (Administrative Code, 2006). Firstly, the violator may be publicly condemned. The condemnation may be aired in front of her co-employees or to the members of an organ of which she is a member. Secondly, it is more common for a penalty to be structured as a fine: the violator pays a predetermined sum of money to the State. Thirdly, the violator may be temporarily deprived of the right to exercise a certain profession or activity. This affects the legal competence of the violator but does not result in the revocation of her professional qualifications. Finally, administrative law may be enforced through confiscation. The measure serves to extinguish the violator's title to property.

In the main, administrative liability is personal. In some instances, administrative penalties may be levied against corporate bodies. Liability may only be attached to persons who have attained the age of 18. Persons below that age are generally subject to limited administrative liability. *Doli incapax* (deemed incapable of

forming the intent to commit a crime or administrative violation, because of age) is a complete defence (Hrusanov et al, 2012). However, liability is transferrable to the violator's parents or custodians. Finally, liability does not accrue to officers of the State who commit a violation while acting on the ostensible authority of their principal. The rule against double jeopardy applies in administrative law: no person may be punished twice for the same violation.

Face-veiling as an administrative violation

According to the Act, face-veiling is an administrative violation. As such it follows the procedures described above. Administrative procedure as per usual commences at the issuance of a penalty notice which may only be drafted by persons who derive their authorisation from legislation. The Act contains explicit provisions that the organs responsible for drafting penalty notices are the organs of the Ministry of Internal Affairs (or the Police) (S7 of the Act, 2016).

In addition, the penal organ competent to administrate a penalty is hierarchically superior to the penalty notice issuing organ – in this instance, the Police. Hence, the penal organ is the Minister of Internal Affairs, as stated in S8 of The Act. The sanctions envisioned for the administrative violation of face-veiling are fines – 200 lv (roughly £90) for first offence and 1500 lv (roughly £700) for each consecutive offence (S6 of the Act, 2016). The Minister of Internal Affairs incorporates the sanction in a penalty ruling. The penalty ruling is then as per usual presented to the violator for signature whereby liability is attached to the violator (Hrusanov et al, 2012).

Parliamentary passage of a bill

The National Assembly of the Republic of Bulgaria or the Parliament holds legislative power (Constitution, 1991: A62). The institution in question has a mandate to exercise legislative power for a limited time as elections for new Parliament are held every four years (Constitution, 1991: A64 (1)). For a bill to become law, the legislative organs need to follow a procedure laid down in the Constitution (1991). Initially, a proposal for legislation or a bill is submitted to the

Council of Legislation, which is nested within the Ministry of Justice. The Council of Legislation assesses the proposed bill and its congruence with national legislation – like the Constitution and other acts. The Council also checks for incongruences with supranational legislation active in Bulgaria – for instance, international acts, international contracts between Bulgaria and other States and the European Union legislation. International legislation and international instruments must be ratified by National Assembly and they supersede national legislation when inconsistency is present (Constitution, 1991: A85).

If the bill meets the congruence criteria with national and supranational legislation it continues its journey to the next phase, which is parliamentary. Every bill must be submitted with motives attached to it – or the rationale behind the bill's inception. Any Ministry, the Council of Ministers or any Member of the National Assembly is competent to submit the proposed bill to the Chairman of the National Assembly. After approval, the Chairman passes the bill to the relevant Committee(s) of the National Assembly. The Committee(s) scrutinising the bill are selected based on the bill's topic – one Committee is assigned a primary or 'chief' status and others may be assigned subsidiary or 'participatory' status. Each Committee meets separately to discuss the bill and reports their discussions publicly by uploading their report onto the website of the Bulgarian Parliament. At this stage, there are three options for the bill: it can either be considered (accepted), amended (returned for amendments) or rejected. If deemed acceptable (even subject to corrections and amendments), it is passed on to the National Assembly. Bills are 'read' or discussed twice – the process of which is called 'first reading' and 'second reading' (Constitution, 1991: A88).

At this point, 'the first reading' the bill is either approved or rejected. Even though accepted in principle, it may be subject to amendments; in that case, it is sent to the relevant Committee who had approved it in the previous stage for the purposes of further amendment. Changes cannot be made to the principal intention and to the topic of the bill – e.g. if it aims to dampen traffic accidents though new restrictions on safeguarding measures (such as mandatory seatbelts), this topic must remain the same, regardless of the corrections prescribed. If accepted in principle and corrected accordingly, the bill receives its second reading of the Parliament which leads to its adoption. Once adopted by the National Assembly,

the bill is sent to the President for evaluation. The president can either promulgate the bill or veto it.

If deemed reasonable and acceptable, it is in the President's discretion to publicise the bill with a Presidential Decree. If a bill receives a Presidential Decree, it is incorporated into the body of laws by the act of publishing in the State Gazette. The President may also veto the bill and return it to the Parliament for new discussions. The veto must be accompanied by written motives. The vetoed bill is compiled with the motives and sent for further discussion by Parliament. The passage of a bill, previously vetoed by the President, requires a majority of more than fifty percent of all Members of the National Assembly (Constitution, 1991: A101 (2)).

A veto does not restart the whole procedure of passing a bill; instead, it is returned for one 'reading' only. After this discussion, the President is obliged to promulgate the bill, while the Parliament is not obliged to take the presidential comments under consideration (Constitution, 1991: A101 (3)). Bulgaria's legal system is continental as opposed to common law and the use of precedent in the English legal system. The Bulgarian judicial system is hierarchical in nature and according to the principle of separation of powers (de Montesquieu, 1748) is independent of legislative and executive power (Constitution, 1991: A117). For the purpose of clarity, I present a visual illustration of the timeline of the face-veiling legislation in Bulgaria.
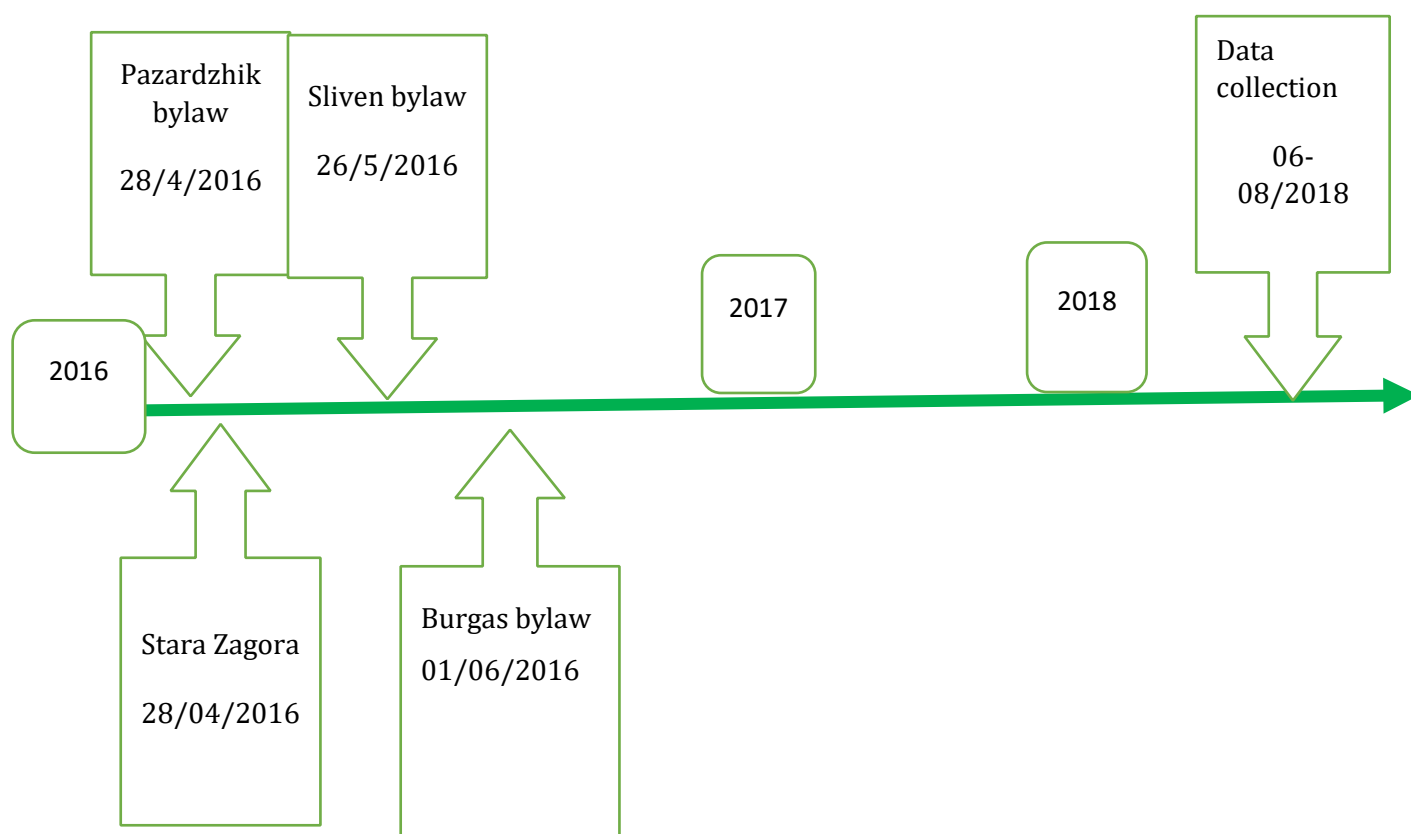
Figure 3.1. Timeline of face-veiling legislation: bylaws and national ban.

Enforcement of the face-veiling ban

Information on the enforcement of face-veiling legislation is scarce. In the immediate aftermath of the ban, two burqa-clad reporters were able to enter the offices of the National Revenue Agency and Sofia Airport unobstructed (Petrov, 2016). At the latter site, there were armed members of the security forces, who paid no heed to either garments or wearers. However, the two reporters were apprehended by police officers once they left the airport. The report became the subject of a parliamentary debate. Iskren Veselinov, a Member of Parliament from United Patriots, put a question to the Home Secretary, Rumyana Bachvarova (Club Z, 2016). Veselinov was key figure in pushing the law as he attended Parliamentary Committee meetings when the draft bill was discussed (Report of the Religious Denominations and Human Rights Committee, 2016; Report of Regional Policy,

Public Works and Local Self-Government Committee, 2016). He voiced concerns over the police forces' apathetic response to the reporters' presence. The Home Secretary replied that the burqa ban was relatively recent and that the reporters had been apprehended outside the airport. Veselinov expressed his satisfaction with the outcome (Club Z, 2016).

In December 2016 Bachvarova reported that, since the law's entry into force, only one penal ruling had been issued nationwide (ibid). However, The Bulgarian National Television reported that Police Officers in Pazardzhik had issued eight penalty rulings by August 2016 (Petrov, 2016). Since the national ban was voted in September, this means that the local bylaw was applied.

Steering force behind the anti-veiling act

In September 2016 in efforts to improve security, Bulgarian Parliament approved a bill that bans the concealing of the face in public spaces. The bill was submitted under the code number 654-01-58, and later was approved as the 'Act banning garments partially or fully covering the face'. The new legislation was pushed by Bulgaria's nationalist Patriotic Front coalition (now called United Patriots). The coalition's co-leader Krasimir Karakachanov highlighted the security rationale, adding: "The burqa is more a uniform than a religious symbol" (Fenton, 2016). Indeed, this statement is important to consider, as the United Patriots drafted the bill and were present at every stage of its discussions.

The proposed bill was initially submitted by 13 MPs from the then Patriotic Front (currently United Patriots) to the Council of Legislation. The driving forces behind the bill are solely MPs from the United Patriots – a national umbrella organisation made up of all right-wing, Christian democratic and nationalist parties, currently holding 9% of MP seats in Parliament. The United Patriots have formed a government with the centre-right party GERB. Despite their relatively low share of MP seats, the United Patriots currently head important ministries, such as the Ministry of defence; the Ministry of labour and Social Policy; the Ministry of Economics; the Ministry of Water and Natural Resources; and the Ministry of Culture.

The text of the anti-veiling bill and motives behind it

The text of the bill, presented earlier in the chapter, prescribes a prohibition of covering the face in public spaces, except for health-related reasons or due to professional safety or in special cultural or sports events, as an episodic occurrence. The bill envisions administrative responsibility for offences – fines, but also a penal responsibility for the actors forcing others to cover their faces (it contains proposed amendments to the Penal code). The motives of the bill provide illuminating evidence regarding the areas of concern of the bill's initiators. The stated aim of the legislation is to "prevent the abnegation of democratic principles of gender equality and humanism which are seen as core foundational values of the Bulgarian State, the EU and all of the developed world" (Bill 654-01-58, 2016). The bill aims to respond to the urgent need of regulating the social relationships in Bulgaria, which entail human rights violations and also aggressive limitations of freedoms of women.

The subject matter of the proposed legislation is a prohibition of garments and accessories covering the face in public places – in official buildings, and places where social activities take place. By contrast, covering of the face is deemed acceptable in private households. The initiators of the bill are concerned with two main factors – the "alien character" of face-veiling practice, which is not typical for "traditional Bulgarian Islam" (Bill 654-01-58, 2016). In addition, face-veiling is not practiced by any other religious communities in the territory of Bulgaria.

In addition, in the motives of the bill, the United Patriots put forward an assertion about the actual motivation for wearing the face veil: it is a political instigation, sponsored by countries from the Middle East who are fostering ferocious radical Islamism. Hence, the legislation's aims are defined twofold: firstly, the bill aims to protect women's rights; and secondly, it aims to protect the national sovereignty, national identity and national security from aggressive assimilationist assaults. Radical Islam, according to the motives of the bill is an ideology, not a religion. As stated in the motives: "[T]he ideology of radical Islam has clear political goals of oppressing non-Muslims and it is the main factor for the self-inflicted isolation of Muslim communities" (Bill 654-01-58, 2016).

The reasons for creating such legislation are described as complex. Firstly, wearing a garment covering the face prevents identification of the citizen. Not being able to identify people is dangerous to State security in general, but also in particular it allows for terrorist acts conducted by "female kamikazes" (ibid). Secondly, wearing a face veil presents an act of propaganda of radical Islamist ideas. The face-veil is a "demonstration of disrespect for the core secular values of Bulgarian society" (ibid). Finally, the motives of the ban also include a statement on women's rights, more precisely that face-veiling is "symptomatic of the subjugated position of women in radical Islam and Bulgarian laws prohibit the unequal treatment of women" (ibid).

Clearly, the motives of the ban draw a distinction between the "developed world" which is democratic and safe and the "ideology of radical Islam" (ibid). The act of face-veiling is equated to an "abnegation of democratic principles of gender equality and humanism" (ibid). Indeed, Bulgaria s part of the developed world and the European Union is seen in opposition with face-veiling and the values it represents. The debate in the motives is clearly not about the practicalities of the face-veil, but it is a debate between values the perceived conflict between value systems.

Passage of the Act banning garments partially or fully covering the face 2016 (colloquially known as the 'burqa ban')

The present section will explore the passage of the actual ban on face-veiling. To refresh our memory, the usual passage of a bill contains two phases – an executive and a legislative one. The bill was submitted to the Council of Legislation, which is within the Council of Ministers, hence it is an institution with executive power privileges. It was determined that the bill is congruent with other national and supranational legislation. The next phase of the bill's journey was parliamentary, or legislative. Furthermore, the 13 MPs submitted the approved bill to the Chairman of the National Assembly on 20/04/2016 under registration code 654-01-58. Thereafter, the Chairman assigned the bill to the relevant parliamentary Committees for discussions. The Religious Denominations and Human Rights

Committee was named a chief committee, while the appointed participating Committees were: Regional Policy, Public Works and Local Self-Government Committee; the Internal Security and Public Order Committee; and the Legal Affairs Committee. Although recordings and minutes from the Committees' discussions have not been made available to the general population, each Committee has composed a report on the face-veiling bill. Perhaps parts of those reports can enlighten the reader about the aims and motives of the bill and its function in the eyes of the legislators. Hereafter, a short summary of key points made in in the reports submitted by each Committee will be laid down.

Report of the Religious Denominations and Human Rights Committee, 26/05/2016 (Chief Committee)

The Committee session was attended by the deputy minister of security, Mr. Krassimir Tsipov; Mr Aleksandar Steffanov, an expert from the Ministry of Justice; and Mr. Oleg Petkov, the co-chair of the State Agency for National Security. Others present included experts from the Ministry of Justice as well as representatives of various security-related agencies and NGOs. Mr Iskren Vesselinov of the United Patriots attended on behalf of the steering group behind the bill. Mr Vesselinov stressed that the proposed bill was inspired by French legislation and that six EU countries have adopted similar legislation already. Vesselinov affirmed that freedom of religious expression is indeed fundamental in the conception of the bill. In his view, the bill rests upon a two-sided rationale: freedom of spiritual expression on the one side, and national security on the other. The national security component is embodied in the prohibition of clothes that are non-traditional for Bulgaria and also symbolise "other tendencies". Furthermore, it was affirmed that the bill aims to unify already existing local initiatives: a few city councils had already banned face-veiling through bylaws and there is a clear need for national unification of the legislation.

The bill had the expressed motivation of countering "a dangerous trend visible throughout Europe", namely: "the normalisation" of radical Islam. Radical Islam is "a religion that opposes the quintessence of the Secular State" as it "denounces key democratic principles and gender equality" (ibid). Vesselinov proposed that

the last few years this type of ideology has amounted to 2/3 of terrorism's death toll worldwide (Bulgarian Prliament, 2016a). Thus, it is important that Bulgarian authorities react on time and since the tendency to adopt radical Islam is already visible, the State must protect itself. Vesselinov affirmed that, in a domestic environment or in temples, religious garments should be allowed. Nonetheless, in public spaces, all citizens should be identifiable, and manifestations of antagonistic anti-secularism should not be tolerated since secularism is in the core essence of the Bulgarian State. As a representative of the steering group behind the ban, the United Patriots. Mr Vesselinov took keen part in the debates of the Commission, as visible in the report they have produced.

Mr Aleksandar Stefanov on behalf of the Ministry of Justice, expressed his support for the bill because it offers legal protection of the dignity and freedom of citizens. He constituted there is no incongruence between the bill and other national and supranational legislation, including the European Convention on Human Rights. In addition, he endorsed the concluding remarks in the bill, where an amendment in the Penal Code of Bulgaria are envisioned, namely a new offence: forcing a female to wear a face-veil will be made a crime since face-veils are symbolic of radical Islam[8].

Mr Oleg Petkov, deputy chairman of the State Agency for National Security affirmed support for the proposed bill and defined it as a measure, part of the larger State policy of counter-terrorism. As stated by the speaker - without a doubt, clothing that covers one's face is a security issue as citizens are virtually unidentifiable. In Petkov's view, the proposed bill reflects the new dangerous tendencies spreading across Europe particularly, but also across the world globally. Mr Birali Myumyun, deputy chief imam of Bulgaria agreed with the bill in principle, however, warned against its possible unforeseen effects on other Muslim women, who do not cover their face fully, but only wear the head, neck and ear covering

---

[8] Such an amendment is not yet approved at the time of last revisions of this chapter (December, 2020).

attire – the hijab. Hence, he recommended amendments to the bill regarding the partial covering of the face, so women wearing the hijab would not be affected by the Bill. After discussion, the bill was approved by 11 people voting 'aye' and three members of the Committee abstaining.

Regional Policy, Public Works and Local Self-Government Committee report, 12/05/2016 (participating Committee)

Mr Vesselinov was also present at the discussion and represented the initiators of the proposed bill. The report does not contain statements made by individual MPs and experts but instead is a unified collective statement made on behalf of the whole committee. The report narrates that the bill attempts to regulate the garments fully or partially covering the face. The aims of the bill are regulation of the aggressive abnegation of human rights of women who are forced to wear burqas and other garments covering the female body, typical for communities suffering from "radical Islamism" (Bulgarian Parliament, 2016b). The bill bans such attire in public spaces – where sport, cultural events and communication are happening and the nature of those spaces makes them vulnerable to acts of terrorism, easily conducted by masked people wearing burqas. The committee approved the bill with the full majority – 13 out of 13 people voting 'aye'.

Legal Affairs Committee report, 26/05/2016 (participating Committee)

The Committee meeting was attended by Mr Krassimir Tsipov, Deputy-Minister of Security and Ms Participant 6 Rangelova, head of Legal affairs at the EU directorate. The bill was presented by Mr Emil Dimitrov on behalf of the United Patriots, who stressed that the bill aims to provide a response to the new need for strict legal regulation of social relationships hindering personal freedom and dignity. Mr Filip Popov underlined that the bill has a character of emergency legislation as it only contains eight articles and perhaps it would be more reasonable if the new norms become incorporates in an already existing bill – for instance in the Penal Code and the Administrative Violations Code.

Mr Chetin Kazak from DPS (the Turkish ethnic party) shared that covering the face is not "traditional" for Bulgarian Islam; however, he would not condone the bill (Bulgarian Parliament, 2016c). Still, Mr Kazak expressed hope that if the bill is passed, it may help coping with hooliganism and assault made by masked assailants. Mr Svilen Ivanov condoned the bill and in relation to this comment, he noted that on many occasions it is impossible to identify criminals as they cover their faces. The Committee approved the bill with two members abstaining and 12 members voting 'aye'.

Internal Security and Public Order Committee report, 01/06/2016 (participating Committee)

The Committee meeting was attended by Mr Krassimir Tsipov, deputy-minister of security and Ms Participant 6 Rangelova, head of Legal affairs at the EU directorate. The report contains a reference to parliamentary statements made by Mr. Karakachanov, co-leader of the United Patriots and main supporter of the bill. In his statement, he had stressed that the bill is to deal with a dangerous trend relating to some core groups "converting people to radical Islam, sponsored by external funders". Such radical Islam, according to Karakachanov "is very dangerous, not only security-wise, but also socially, as it divides the Muslim population into 'righteous' and 'deviant' Muslims" (Bulgarian Parliament, 2016d). Radical Islamists, proposed Karakachanov, antagonise their own community as well as the general population.

Karakachanov drew a larger picture of the processes he believes are encompassing the whole of Europe. According to him, face-veiling in Bulgaria is a by-product of a larger process, already typical in many European countries – where women have started wearing the face veil. The results of these radical Islamism processes have been assessed as dangerous in the last 4-5 years, and many European countries have tried to regulate the use of "symbols of radical Islam". The whole idea of the bill is to enable police and security forces to prosecute radical Islamism, as it poses an urgent threat to State security. The MP Dimitar Delchev supported the bill by saying it will help Bulgaria preserve key European values, upheld by the European Union of which Bulgaria is a member. The bill was approved with 12 out of 12 votes.

Following the approval by the four committees, the bill was submitted to the Parliament for initial discussions ('first reading') on 15/06/2016 and accepted on the same day. The second discussion of the bill happened on 30/09/2016 and it was approved the same day by Parliament. The President did not use his right of veto and the bill was published in State Gazette issue 16/10 80/2016.

Interesting statements made at the 'first and second reading' of the bill

The Turkish Movement for Rights and Freedoms (DPS in Bulgarian) refused to participate in the vote during both discussions on 15/06 and 30/09. The Turkish Movement (DPS) claimed the ban would incite religious and ethnic hatred (Skrinski, 2016). The ruling majority centre-right party GERB affirmed the ban does not relate to religious rights but its sole aim is to boost national security. When faces of citizens are uncovered, better surveillance is possible (Krassimirov, 2016). Skrinski (2016) reported debates from the first discussion of the bill. It is worth mentioning that during the parliamentary discussions of the bill there were a few statements put forward by political leaders that are interesting.

 The first two come from Muslim MPs who belong to two different parties – the ethnic DPS and the centre-right GERB. The first statement was made by Mr Hussein Hafsazov of DPS; according to him, the bill undermines the dignity of Muslim women. This was followed by a rejoinder from MP Semir Abumelih from GERB who accused Hafsazov in the cynical political manipulation of religious grievances. According to Abulemih, nowhere does the holy Quran prescribe the use of a burqa, hence face-veiling is not a Muslim practice. Another MP from the left-wing BSP party reminded people that a similar law limiting religious attributes was also adopted by Attaturk in reforming 1925 Turkey.

Discussion

To conclude, the paper reviewed the characteristics and responsibilities of County Councils. Furthermore, the paper presented the bylaws adopted by four Councils to ban face-veiling in 2016. As Face-veiling is an administrative violation, the paper also scrutinised the nature of administrative violations, the procedure of enforcing administrative liability, the remedial measures attached to it and the institutions involved in the process. Additionally, the paper reviewed the limited information available on the application of both national and Council legislation. It has been established that a few cases exist where face-veiling has been sanctioned, however information remains scarce.

The present report attempted to achieve two goals. Firstly, the paper attempts to produce a sketch of the legislative process in the Republic of Bulgaria. Secondly, the paper proposed an overview of the process of passing the bill banning face-veiling. The text of the bill, now ratified as an act, is fuzzy and does not particularly allude to Muslim women, nor terrorism. At first glance, its text simply regulates the appearance of citizens in public spaces. The exclusions of the ban, listed in S3 include reasons for covering the face that excuse this behaviour – such as health-related reasons, professional activities and special events where this garment is either required to preserve health or has an episodic character. S3(2)2 does grant prayer houses the permission to host people who veil their faces. Still, there is no mention of Muslims or Muslim women.

 The lack of explicit mentioning of Muslims and Muslim women, as well as the silence about security concerns within the Act, transpire as explicit motivations and areas of concern in the motives attached to the bill. In addition, the motives also transpire in discussions of the Act, as reported by the Parliamentary Committees in the four reports summarised above. Based on the reports submitted by the Committees as well as based on statements made by key politicians, one may distinguish and enlist a few aims of 'the burqa ban': countering the spread of radical Islam across Europe; protection of human rights and dignity (in particular of women forced to wear a burqa); protection of values – traditional Bulgarian Islamic values, Bulgarian secular State values, European values; security aims – to

be able to identify all citizens and prospectus criminals and to aid video surveillance.

The justification of the proposed legislation is explicitly laid out in the motives that support the ban. The direct quotations I have presented reveal without a doubt a set of boundary judgements that are evaluating the practice of face-veiling and the people who practice it as dangerous to the democratic ideals, upheld by the Bulgarian State.

Additionally, statements made at the parliamentary Committee meetings appeared to be value-laden. Sometimes the moral justification of new legislation is obscured by scientific talk – e.g. the ban on smoking in commercial indoor settings is justified by concerns of public health. Thus, the recent terrorist attacks across Europe were relied upon as factual justification for banning the veil as the veil is intrinsically linked with extremism and oppression. The time is opportune to introduce the insights of systems thinking and the importance of values and perspectives to intervention design. The following chapter will present the development of systems thinking. More importantly, I will also situate my research in the paradigm of systemic intervention where the critique of boundary distinctions and values, the judgement on a creative design of methods for action aimed at the improvement of those affected by the same action are taken into consideration in a holistic manner.

Chapter 4 : Main developments in systemic management science

The discussions surrounding the legislation and the formal documents that support it present a palette of value judgements. In systems thinking these value judgements are called boundary judgements that are informed by values (Churchman, 1970, Ulrich, 1983, Midgley, 1992). In this chapter, I will endeavour to trace the main developments in the field of systems thinking and I will set the scene for my choice of research paradigm as well as my choice of methods.

While the roots of systems thinking can be traced back to antiquity (M'Pherson, 1974; Midgley, 1992; Crowe, 1996), the contemporary community of systems researchers generally traces its origins to the early-to-mid 20th Century (Hammond, 2003). Systems thinking evolved as a response to reductionist and mechanist thinking. Reductionism is the belief that knowledge can be gained by breaking down systems to their essential parts and studying them (von Bertalanffy, 1950). Mechanism is the belief that everything works like a machine – deterministic and in-principle predictable (Midgley, 2000). The reductionist approach to knowledge relies on separating elements from the whole and studying them in isolation through observation and analysis of the behaviour of these parts in 'a vacuum', or separately from everything else in the said system (Capra, 1998). Reductionism follows from mechanism, and it consists of the search for simplified causal relationships between simple variables, without taking into account complex interrelations (Midgley, 2000). Thus, systemic thinking is a shift to looking at the wholes where components interrelate. These 'wholes' are, namely, systems (Ackoff, 1974). Thus, a system can be seen as a whole, consisting of two or more interrelated elements (ibid). Most importantly, the elements exist in an interrelated network where they exhibit synergistic properties, thus elevating the whole system above the sum of its parts (Flood and Jackson, 1991).

The development of the body of knowledge known as systems thinking was studied by Midgley (2003) and codified in four volumes. In an earlier book, Midgley (2000) contends that there are three main 'waves' of systems thinking that do not cancel

each other out but build upon each other. The said waves are hard systems thinking, soft systems thinking and critical systems thinking (Jackson, 1991b, 2019), or the first, second and third waves, respectively. For the purpose of justifying my methodological choice, systemic intervention, I will review the development of systems thinking, characterising the three waves and pointing out the main criticisms and shifts that led to the emergence of each new wave. This will provide a 'landscape' of systems paradigms that will allow me to explain the choice of systemic intervention as an approach.

The present PhD thesis deals with the effects of the face-veiling legislation in Bulgaria on Muslim identities – a social policy issue. As systems thinking encompasses many fields – engineering, medicine, psychology, ecology, etc., that are irrelevant to my proposed research, I will focus only on what is traditionally known as 'management systems' (Yolles, 1999), as this is concerned with the application of systems thinking in the policy and organizational domains.

The first wave: hard systems thinking

The first wave of systems thinking emerged in the late 1950s, most notably with the open systems theory of von Bertalanffy (1950) and Bateson's (1972) theory of pathological communication. Also, socio-technical systems theory came from the work of the London-based Tavistock Institute of Human Relations and the British coal mining industry in the 1950s and the early 1960s (Trist & Bamforth, 1951; Emery, 1959; Trist et al. 1963; Emery & Thorsrud, 1976; Trist, 1981;). It promised a viable alternative to hierarchical technocratic bureaucracy. socio-technical systems theory postulates that organisations have both technical and social components, and both need to be considered together in managing an organisation. This approach relied on two key elements. Firstly, the socio-technical systems theorists advocated the use of semi-autonomous working groups that rely on internal supervision and leadership, focused on responsible autonomy (Trist & Bamforth, 1951). Secondly, these theorists recognised that both social and technical elements make up any given organization, and to optimise its outputs and processes, the social and technical components should be co-designed (For a wider discussion of the development of STS please see Geels, F. W. ,2004).

The first wave of systems thinking is often called `hard systems thinking' because of its reliance on quantitative methods (Checkland, 1981). The scholars who belong to the first wave championed the first notable shift away from reductionism and into holism. For example, Bateson revolutionised mental health thinking with his critique of previous theories of schizophrenia. Up until his critique, schizophrenia was seen as a disease of the individual, isolated from the family environment. Bateson (1960) proposed that family dynamics and pathological patterns of conversation had been neglected. Bateson's ideas gave rise to the school of systemic family therapy, most notably represented (in those early years) by Weakland and Jackson (1958), Jackson (1960) and Haley (1963).

Other interesting examples of first wave or hard systems thinking approaches include systemic operational research (OR). According to Jackson (1991b, 2019) and Midgley (2000), the four most notable approaches within systemic OR in the 1950s to the 1960s are system dynamics, systems engineering, systems analysis and the viable system model. Below, for the purpose of brevity, I will review these four approaches in bullet points:

- ❖ System dynamics aims to capture the dynamic behaviour of complex systems by modelling the relationships between components of the investigated system (Forrester, 1961; 1969; Meadows et al., 1972).

- ❖ Systems engineering is an interdisciplinary science of designing whole and integrated systems. It focuses on identifying the appropriate roles of subsystems. Subsystems interact with each other, hence the performance of a given subsystem interacts with the performance of another; the output of one subsystem is the input of another – so understanding the details of the relationships between sub-systems is crucial to the systems engineer (Jenkins, 1969). Systems engineering is concerned with system design, operational improvement and risk management (Hall, 1962; Jenkins, 1969).

- ❖ Systems analysis helps decision-makers by evaluating and comparing cost, risk and effectiveness, to inform a potential course of action (Quade, 1964). Systems analysis often deals with large scale practical problems such as

environmental and social issues, including policy issues (Miser & Quade, 1985; Miser, 1994).

❖ The viable system model seeks to maintain organisational `viability', or the organisational responsiveness to its environmental processes (Beer, 1972, 1979, 1985). The use of the viable system model promises organisational viability and sustained success in its co-evolution with its environment. The co-evolution is dependent on the ability of the system (the organisation in question) to scan the environment and manage operations through a complex network of feedback loops, all the while maintaining the self-organised character of operations. The VSM has had a wide range of applications across multiple types of organisation – from cooperatives to governmental agencies, as evidenced by Espinosa and Walker (2011).

Critique of the first wave of systems thinking

While the first wave of systems thinking did contribute to the effectiveness of human activity, it did little to deal with contested values, goals and objectives, and it was seen as preoccupied with perfecting models of reality (Churchman, 1970; Ulrich, 1987). The omission of the study of values had two consequences. Firstly, human beings were seen as hollow vessels who would simply embrace the improvement that is proposed to them (Checkland, 1981). Thus, many stakeholders were 'muted' in practical applications and become excluded from managerial decisions (Jackson & Keys, 1984).

The first wave was criticised for its overreliance on experts who might not actually have as much contextually-relevant knowledge as the members of the organisations they intervened upon. Also, the managers who were enacting the systemic design often did not consult the main people who will be affected by these changes, and thus some projects were discontinued as the changes were deemed unacceptable by key stakeholders (Rosenhead, 1987). Perhaps, more importantly, projects and policies that perpetuated injustice were implemented because of this lack of engagement with those affected (Jackson, 2003).

The result of first wave projects were often 'logical' models, portrayed as objective representations of issues and recommendations for change. But these models tended to miss issues of concern to stakeholders, as the subjective and inter-subjective perspectives of the latter were not recognised as vital to decision making on what was to be modelled. Soft systems thinking came to be proposed as a way to augment hard, given that soft systems thinking pays particular attention to stakeholders and the issues that concern them (Checkland, 1985)[9].

Most notably, Churchman (1970) recognizes a dramatic flaw in first wave thinking – its neglect for implicit systemic assumptions. This omission is due to the false belief that research is a matter of observation alone – the classical empiricist notion, which states that external events can be 'understood' through the senses. The systemic judgements which remain implicit are ones regarding the boundaries of the system and the nature of the decision maker, and these strongly influence data gathering.

Another erroneous assumption of first wavers, according to Churchman (1970), is the lack of understanding of the relationships between decision makers. In many organisations, he argues, the presumed carrier of power, the top management, is sabotaged by middle management. Additionally, even individual decision-makers are at times characterised by conflicting attitudes and values, and even when the researcher designates a person as an individual decision maker, they should recognise the institutional and value-full diversity one single person may be hosting.

Criticism is also directed towards the objectivity aspirations of first wave practitioners. Objectivity is based on a "distinction between an ethical-moral man,

[9] Checkland originally refers to the correspondence of John Maynard Keyenes to R. F. Harrod in 1938: "It seems to me that economics is a branch of logic, a way of thinking; and that you do not repel sufficiently firmly attempts ... to turn it into a pseudo-natural science.... Economics is a science of thinking in terms of models joined to the art of choosing models which are relevant to the contemporary world. It is compelled to be this, because, unlike the typical natural science, the material to which it is applied is, in too many respects, not homogeneous through time." (Keynes, 1938)

who is believed to be emotional, involved and biased", on the one hand, and "a scientific man, who is believed to be unemotional, uninvolved and unbiased", on the other (Ackoff, 1979, p 102). Ackoff (ibid) contests the separability of the ethical-moral and scientific by way of an analogy: just because we can look at the heads and tails of a coin on their own, does not mean we can truly split and use them separately – the coin is still a whole object.

Thus, Ackoff (1979) proposes that objectivity is not a human property, but a systemic property of science. The absence of value judgements, the removal of 'the heart' from the scientist, does not grant her an objective mind – such separation is actually impossible. Hence, objectivity only appears to emerge when a variety of subjective and inter-subjective value judgements have already been made (for instance, about what to research). Thus, objectivity is the product of value-full interaction and, thus, research cannot be not value-free. In Ackoff´s (1979) perspective, systemic operational research focuses on problems as well as the optimisation of systems. However, real life problems emerge from systems and are often so complex that they appear to be 'messes', not neatly independent problems. Similarly, there is a need to design new forms of organisation that are adaptable and capable of learning, rather than to optimise the old-school hierarchical organisations.

This chimes with Checkland (1985), who criticises the first wave of systems thinking, and more specifically its vocabulary of problems and solutions that comes with the trap of simplifying complex problems. This simplification leads to the design of so-called 'optimal' solutions that do not actually work because the depth of the complexity has not been accounted for. To conclude, Churchman (1970), Ackoff (1979), and Checkland (1985) expressed the need for including value judgements, stakeholder participation (the social aspect of socio-technical

systems thinking[10]) and to begin thinking about how organisations can learn and adapt to changes in their environment.

The second wave of systems thinking

The second wave of systems thinking emerged out of criticisms of the first wave. The second wave criticises the relatively simplistic view of problems and their modelling, inherent to the first wave. Hence, the second wave tried to define and tackle ill-structured problems or messes (Jackson, 1991b, 2019). Second wave systems methodologies do not reduce complex messes to something that can be mathematically modelled. On the contrary, they seek to explore these messes by engaging different perspectives of multiple stakeholders. As Jackson cogently notes, hard systems thinking ignores subjectivity and intersubjectivity, while soft systems thinking embraces the multitude of subjectivities out there. Hence it has an interpretivist character (in contrast to the neo-positivism of the first wave). Second wave methodologies embrace the notion of multiple realities, which follows from the fact of multiple worldviews. Hence, the models that soft systems thinking proposes are not models of reality, but models of *ways of looking* at reality (my italics), plus potential actions that could be taken to enable improvement.

The inherent inability of hard systems thinking to consider disagreement, and therefore to problematise objectives and consider whose objectives should be taken as pertinent, was said to be a key weakness in hard systems thinking (Checkland, 1985). Hard systems approaches are united by the notion that organisations are machine-like, and hence can be designed, controlled and can yield predictable results (Jackson, 1991b). This underlying assumption of hard systems thinking does not create challenges when developing the technical aspects of an organisation; but it becomes highly problematic when applied to social

---

[10] Midgley (2000) proposes that socio-technical systems thinking avoided much of the criticisms directed at the first wave, namely due to its focus on the social elements of a system, or the semi-autonomous groups.

contexts (ibid). In social systems, there is rarely one single 'owner' who wants to set goals and 'optimise' processes, but a diversity and multiplicity of actors who have competing objectives and values[11].

Hence the second wave is also called 'soft system thinking', as it places the onus on human actors, their beliefs and values. In this new paradigm, systems were not seen as real entities, but as mental or social constructs that can help us understand the world and the interconnectedness of possible future human actions (Midgley, 2000). As Checkland (1985, p. 776) puts it, the shift between first and second waves is "the shift from thinking in terms of models of (parts of) the world to models relevant to *arguing about* the world" [my added emphasis]. Another important change is the need to accept the existence and plurality of worldviews as properties of the creative construction of human beings (Jackson, 1985).

In the following section, for reasons of brevity, I will list a few important strands of the second wave literature.

- ⬚ Strategic assumption surfacing and testing (SAST) is a methodology, which builds on Churchman's (1968; 1971) work, and it aims to evaluate alternative ideas about strategy. SAST is a methodology that tackles ill-structured problems, and in doing so welcomes conflict, assumption expression and assumption challenge through dialogue (Mitroff & Emsoff, 1979). As alluded to in the name of the methodology, this is done via exploration of stakeholder assumptions and through facilitated debate. As with other methodologies belonging to the second wave, SAST promotes active participation in the shaping of a dialogue or a debate. This methodology is heavily influenced by Churchman (1979) who contends that, in order to clarify our ideas, we need to seek out the most sophisticated

---

[11] On the other hand, hard systems thinking could indeed be problematic even for technical problems because they cannot be separated from social ones. For instance, automating a factory might be a technical response to perceived inefficiencies, but workers may object to their jobs being made redundant (Midgley, 2019).

and vocal enemies of our ideas and engage them in an oppositional debate. Thus, SAST relies on a dialectical synthesis of knowledge. It involves four stages – group formation, assumption surfacing, dialectical debate and, finally, synthesis (Mitroff & Emshoff, 1979).

 Ackoff's (1974, 2001) interactive planning stands out as a methodology because of its long-term orientation. It differs from 'reactive planning', which only comes into play in response to urgent problems (what is often called 'firefighting' in the management literature). Interactive planning also differs from 'preactive planning', which is a top-down strategic process that relies on prediction and preparation undertaken in line with a supposedly credible forecast (Ackoff, 2001). Interactive planning engages stakeholders in the design of an ideal future "and the selection or invention of ways of approximating it as closely as possible" (Ackoff, 2001, p 3). It is very participative: representatives from across the entire organisation must be involved, as they harness different creative abilities and different knowledge that may help to construct the vision of the ideal future of the organisation. There are only three limitations imposed on the design: the ideal future organisation must be technologically possible; it must be operationally viable; and it must be able to learn and adapt.

 System dynamics, as presented in the first wave, was a hard systems methodology grounded in mathematics and modelling of dynamic processes (Forrester, 1961; 1969; Meadows et al., 1972). However, in the 1980s, the field was reformed, and its focus shifted from prediction of the dynamics of real-world systems to the use of qualitative causal loop models to facilitate stakeholder engagement (Senge, 1990; Morecroft & Sterman, 1994). This was based on the assumption that tools from first wave system dynamics can aid communication between stakeholders and enable a discussion of complex issues, where the models represent an emerging inter-subjective stakeholder perspective and not necessarily reality itself (Midgley, 2000).

I have abstained from elaborating the full range of soft systems methodologies – illustrations are all that is needed at the present point in the narrative. However, in the next chapter (about the methods I have used for my research), I propose a creative use of soft systems methodology (SSM), an approach that was very important in the second wave. The time is now opportune to draw attention to SSM and to prepare the reader for Chapter 5.

Soft systems methodology

Soft systems methodology, as noted previously, was born out of the criticisms of and disillusionment with the first wave of systems thinking, and it originated in the works of Peter Checkland and colleagues (e.g., Checkland, 1981; Checkland and Scholes, 1990; Checkland and Poulter, 2006). Soft systems methodology implies a model of social reality inspired by the 'alternative' current in social science, as it was in the early 1980s when the mainstream was the neo-positivist Durkheimian functionalism. It is philosophically grounded in phenomenology (Husserl 1913) and its main purpose is to envisage changes in organisations that benefit from a variety of perspectives as it entails a participatory process. Managerial consultants, managers and researchers alike commonly undertake SSM workshops with as many representatives of the organisation as possible. However, according to Checkland himself, about half of SSM projects do not use workshops at all, but involve interviews with participants, and the analyst does the modelling, checking back with participants on its relevance and accuracy (Midgley, 2019)[12].

SSM was originally designed to make sense of and inform interventions into 'problematic situations' or 'messy problems' in organisational contexts. A problematic situation is not a specification of an issue, but also contains all the relevant circumstances surrounding the issue. Checkland intentionally reframed problem into "a mess" (as proposed by Ackoff, 1974, p 21) or "a problematic situation", because in his experience people, when faced with the lexeme problem,

---

[12] Personal communication with Professor Midgley (2019).

switch into short-term thinking mode (Checkland, 1981, p 16). This way, long-term strategic thinking, as well as creativity, are hampered by the urgency of problem-solving (Checkland, 1999).

The first element of the inquiry is the identification of a 'problem situation'. It is worth bearing in mind that there is a distinction between a 'situation' and a 'problem': the latter term implies the existence of an optimum solution, which is possible only in a minority of situations where it is possible to derive a 'right', unilaterally accepted answer. In the case of multiple, conflicting perspectives, there can be no right or optimal answer because what is right or optimal from one point of view could be wrong or worse from another.

The seven stages

As Checkland (1981) notes, drawing on Miller (1956), the short-term memory can only work with a very limited number of items at any one time. Miller (1956) puts the number at around seven (what he calls 'a magic number' – 7 plus or minus 2). This number was used by Checkland to explain his methodology in 7 steps (and also one of the steps involves modelling interactions between 7+/-2 human activities). In later work (e.g., Checkland and Scholes, 1990), Checkland set aside the 7 steps, saying it encouraged an overly systematic approach (missing the importance of iteration and the potential for designing different methods), but most users of SSM have kept faith with the original version. My view is that the 7 steps are very useful because they offer methods that can be adapted for use elsewhere (following the logic of Midgley's, 2000, systemic intervention and the creative design of methods).

The seven stages are structured in two domains – in the 'real world' (or above the line in Figure 4.1) and 'the systems thinking world' – the world of ideas, below the line.
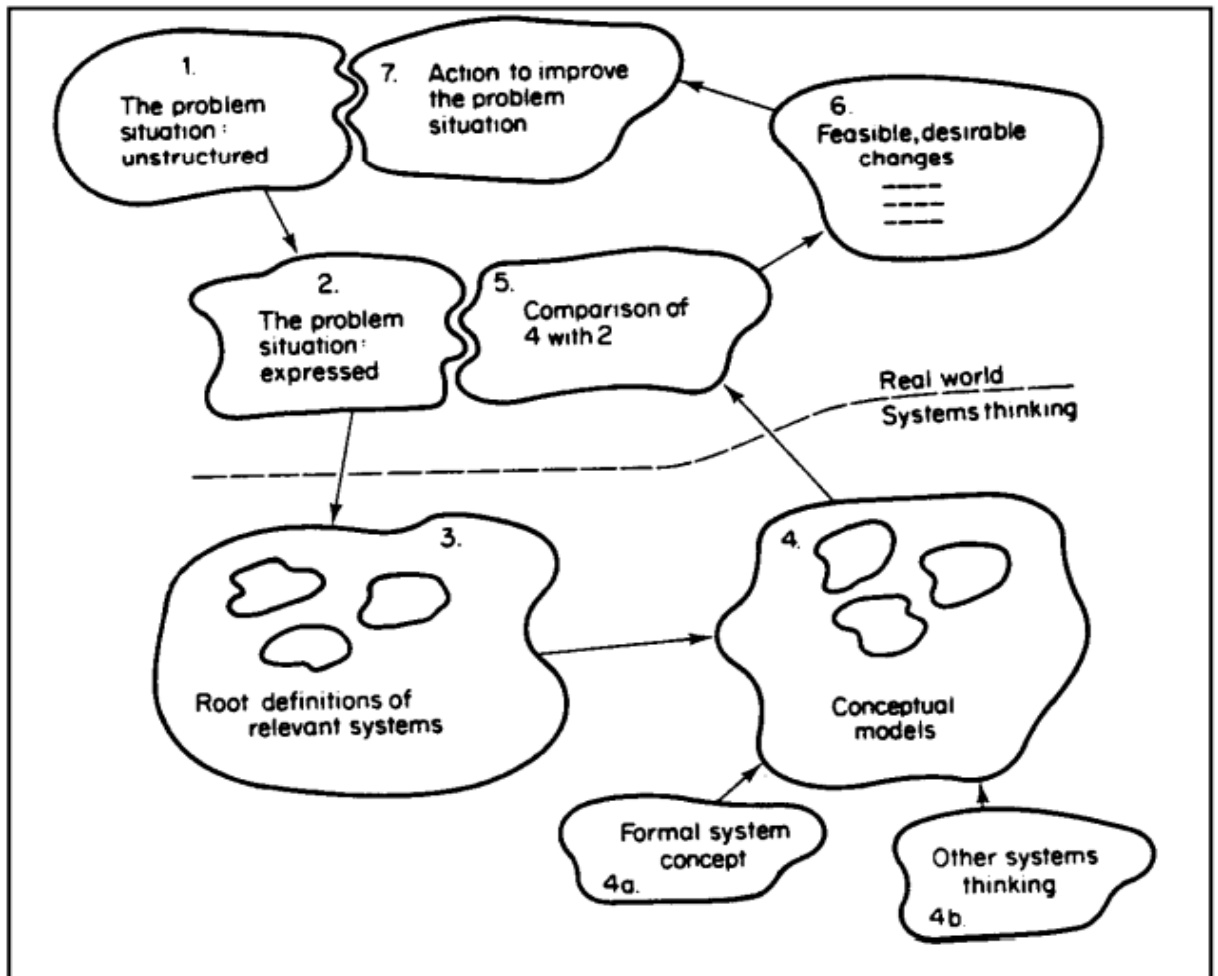
Figure 4.1. SSM: the seven stages adapted from Checkland (1981, p. 163).

Checkland (1981) explicitly states that it is not necessary to commence the application of SSM at stage one: it is feasible to start at any stage, so long as the chronological sequence of the steps is followed. Additionally, it is important to iterate back to past stages as this can facilitate organisational learning and harmonisation of ideas across the stages (ibid). Stage one, initially termed "problem situation: unstructured" (Checkland, 1975; 1981), was later called "situation considered problematic" (Checkland, 1999, p. 27). The change of label of this stage denotes the idea that some situations may be considered problematic by some people, who then would desire improvement; the same situations may not be considered at all problematic by others.

Since soft systems methodology is action-orientated, it is important to be able to align any proposed action with the cultural sensibilities, broadly defined, of the

individuals involved in the problem situation. Specifically, it must be possible to identify roles, norms, and values that the participants acknowledge as imperative (Checkland and Scholes, 1990). Finally, there is a political analysis focusing on the distribution of power within the problem situation. Central to understanding power relations is the concept of commodities of power. These are objects – with the term again construed widely – which symbolise power and which, if possessed, endow an individual with the authority to direct the actions of others.

The above discussion may explain the historic label of the *first stage*: 'problem situation unstructured'. Checkland affirms this stage should be as unstructured as possible. It may involve interviews, observations, reviews of the relevant documentation in the company, etc. It is performed by the investigator, the SSM practitioner, or is facilitated in a workshop with participants. Of course, this phase is preceded by an acceptance that a problem situation exists, which justifies the retention of an SSM practitioner in the first place. This may seem like a hollow comment, but it really isn't. In the conventional mode of SSM, this step is crucial, as only when the problem is recognised and identified does an organisation look for help in addressing it. Also, when the symptoms of an organisational problem become evident, they prompt an investigation into its causes. Checkland tries to unite various interpretations of the problem situation. In this sense, the framing of the mess becomes diverse, as do the solutions. This investigation, however, must commence with an overt expression of the problematic situation.

The *second stage* of the soft systemic analysis entails expressing the problematic situation. This stage involves the production of rich pictures (which later aid intervention analysis), social analysis and, lastly, an analysis of the power structures that are relevant to the problem. The rich picture stage is merely an attempt to provide a rough, graphic approximation of the figural elements of the problem. There is a strong preference for graphical, rather than linear, descriptions. The reason, evidently, is that human systems tend to exhibit a large degree of interrelatedness, which can be expressed more easily in pictures than in linear text (Checkland and Scholes, 1990).

An important and novel feature of rich picturing in SSM is that a diverse group of stakeholders must be represented, as well as the relationships between

organisational entities. This stage, however, does not presume over-structuring: rich pictures examine elements of structure and processes but in a tentative way (Checkland, 1981). At the end of stage two, the analyst and participants should be aware of the notional elements that are relevant to the situation that is considered problematic; this stage does not suggest improvements. To aid the categorising and labelling of processes, a legend is provided: a set of symbols that may describe certain relationships or properties of the elements, such as a rising star, dangerous activity, tension, conflict, etc.

At this stage, a semi-structured attempt is made to identify the roles of the relevant actors. In particular, it is important to identify the issue owner, the practitioner, and the client. This reflects the core phenomenological concern, which is perspective - the identities of the relevant actors are likely to determine their perspectives and intentionalities. Framing effects being strong in human intercourse, the identification of roles is thus likely to guide the drawing of boundaries, and through them possible suggested actions. The next stage facilitates a more concrete definition of the actors and processes under investigation.

The *third stage* centres on naming the 'relevant systems' that can be designed to improve the situation. Stage three moves us from the real world to the world of ideas, so a 'system' is consequently defined as a conceptual model of possible interrelated activities that, if enacted, would have the emergent property of a specified transformation. A common understanding among participants needs to be reached about what each relevant system consists of, and a root definition can be composed for each one: basically, a summary in text of the transformation and its various characteristics. The purpose of defining relevant systems is to express a process of change where an entity (the input) is transformed into a new form of the same entity (the output) (Checkland and Scholes, 1999).

Thus, a root definition is a concise description of a human activity system, *produced in alignment with a certain worldview.* The text in italics in the previous sentence is critically important. Relevant systems and their root definitions are not consensual expressions of the changes everyone wants to see, but *different perspectives* on what changes are desirable, giving people options for

further discussion and choice. In short, every root definition is a perspective on purposeful activities, envisioned as a transformational process. A root definition has the potential to serve as a repository for ideas for future transformations. Its adequacy can be checked against a CATWOE analysis. CATWOE stands for customers, actors, transformation, Weltanschauung, owners and environmental constraints. Each of these is discussed in turn below.

Customers are those who will be affected by a given organisational change. It is necessary to consider Checkland's warning that C-s are not customers in the general marketplace; they are the people most affected by the system in place (Checkland, 1979). In some variations of the CATWOE, C is replaced by B (beneficiaries) and V (victims) (Midgley and Reynolds, 2001, 2004, change CATWOE to BATWOVE). In the original version of CATWOE (Checkland, 1981), C stands for 'client', which means the main stakeholder group that the intervention is targeting. Checkland acknowledges that the client in the mnemonic could be the potential beneficiary *or victim* of the transformation (Smyth and Checkland, 1976; Checkland, 1999).

Despite this acknowledgement, however, many uses of SSM employ the word 'client' to signify only beneficiaries, and victims are commonly omitted from consideration (Midgley and Reynolds, 2004). The framing of 'client' is also problematic in another respect, as it can be misinterpreted as the person or organization paying for an intervention, which is why 'beneficiary' is a better term (Midgley and Reynolds 2001). 'A' stands for actors, or the group of stakeholders responsible for carrying out the transformation (T). The 'T' for transformation represents the change being sought. The next letter in the abbreviation, W, stands for Weltanschauung, or worldview.

This comprises any values and assumptions that inform the transformation. O is the owner of the project – not necessarily a financial owner, but any agent who is capable of stopping the transformation from happening. O encompasses, among other things, the political power of senior managers. E is environmental constraints. The environment includes any ecological, legal and political contexts that affect the system under scrutiny and the proposed intervention but cannot or should not be changed. It is important to stress that the BATWOVE analysis should

be performed for each perspective, as the results it yields are likely to be different for each one.

The *fourth stage* of the SSM analysis involves modelling purposeful activities that are related to the problematic situation. The resulting maps of activities are called conceptual models, and they represent human actions that could be undertaken in order to bring about the transformations defined in stage three. Every activity begins with a verb and all activities are linked with arrows. Once the conceptual models are in place, they can be compared to the rich picture, a process hosted in stage five. Finally, a strategy for action is developed in stage six, where issues of feasibility and desirability are accounted for, while the final stage involves actually taking action for improvement.

Now let us return to the discussion of stages below and above the line in SSM. In the systems thinking realm below the line are the stages that encompass defining the relevant systems and analysing concerns and transformations from a stakeholder's perspective, as well as compiling conceptual models of what actions are needed to bring about the specified transformations. It follows that, once models have been assembled, it is possible to use them to derive "actions to improve". The word 'derive' is significant here: Checkland is clear that the conceptual models are not exact specifications of actions, but simplifications that allow people to see the essence of what is needed to enact a transformation.

Also, it is important to note three differences between 'actions to improve' and 'solutions' as conceived in orthodox analysis. Firstly, actions to improve are not aimed at the attainment of an optimum. This is so because actions for improvement are always seen from a particular perspective, so what is optimal for one stakeholder might be sub-optimal (or not an improvement at all) for another. Secondly, once an action to improve has been identified, the entire analytical process may be reiterated, likely yielding further actions to improve. The term 'solution' connotes a once and for all improvement. Thirdly, the conceptual models can only be transformed into actions to improve through discourse – the participants themselves must select them. This is unlike the position in classical social scientific research, where the analyst derives prescriptions from a purportedly objective model of the world.

It must be noted, further, that there is no requirement for *consensus* between all the parties. That would, once more, entail the rather heroic assumption that the worldviews of the actors involved can be brought into line through simple exposure to conceptual models. Instead, what is sought is *accommodation* – actors can usually agree 'next steps' even if they have different worldviews.

Criticisms of the second wave of systems thinking

Although second wave thinkers and practitioners moved away from the hard systemic paradigm that viewed organisations as machines and people within them, as cogs, their methodologies were subjected to critique. In a nutshell, the critique encompassed the inaccurate treatment of power relationships and structural dependencies inherent to society and human organisations. For example, if contentious topics such as politics or culture are discussed openly in a workshop format, participants may not be able to talk openly about power relationships. By failing to address these, second wavers also could not offer any emancipatory mechanisms that penetrate power structures in society, and thus their grand promise of participation remained limited (Thomas & Lockett, 1979; Mingers, 1980, 1984; Jackson, 1982). In light of this, critics expressed concerns about several flaws of the second wave, which I will review in this section.

Firstly, second wavers were interrogated on their assumption of the Habermasian 'ideal speech situation'[13]. As Mingers (1980) affirms, second wave methodologies tend to reinforce the status quo, instead of redesigning it or critically questioning it. In his review of soft systems methodology, Mingers confirms that, although intended as participatory, SSM in its applications is generally used in a "conservative" way, "legitimating and preserving the W of a particular group of people – those in positions of power and authority" (Mingers, 1980, p 48). Minger's recommendation for second wavers is to recognise the distortive effects

---

[13] The ideal speech situation is one where the participants engage in a dialogue and reason with each other in the absolute absence of any coercive influences (Habermas, 1984a,b).

of power on communication, as some stakeholders have less ability to express and negotiate than others.

Thomas & Lockett (1979) mount a Marxist critique of soft systems thinking, as they reject its claim to political neutrality. Due to its lack of commitment to emancipation, second wave methodologies yield outputs that reflect the interests of the ruling capitalist class. Additionally, these authors propose that the promise of participation through SSM is used in practice to convince employees that their position is not subjugated, and that owners can legitimately profit from workers' labour. Jackson (1987) criticises second wave authors for waging a paradigmatic war with first wave thinkers, thus fragmenting the research community.

According to Jackson (1985, 2000), second wave approaches lack sufficient understanding of the social structure and power dynamics that affect worldviews. Social science accepts that there is a variety of worldviews and perspectives, and that those are socially constructed by individuals and groups. However, individuals and groups may not be aware of the external constraints that affect their social constructions (Jackson, 1985). The focus of Jackson's work is human emancipation, as clearly expressed in the following two quotations from his work:

> "If we view systems from within the radical humanist paradigm (subjective, sociology of radical change), they seem to be the creative constructions of human beings. In order to analyse such systems, we have to understand the intentions of the human beings which construct them. The ability of people to transform the system they have created will be apparent. The way to learn about these systems is to involve ourselves in their activities. Emphasis is placed upon gaining understanding of the current social arrangements that are seen as constraining human development. This facilitates the emancipation of people from presently existing social structures" Jackson (2007, p 24).

> "Critical systems thinking is *dedicated to human emancipation* and seeks to achieve for all individuals the maximum development of their potential" Jackson (1991a, p. 141).

The third wave of systems thinking

After the emergence and the consecutive critique of the second wave, a new, third wave of systems thinking washed ashore. This third wave was called critical systems thinking (Flood and Jackson, 1991). Two main strands of CST will be reviewed in the following section – methodological pluralism and boundary critique (originally called critical systems heuristics, then broadened out beyond this single approach).

Methodological pluralism

The criticisms of the second wave led to rising concerns that there is a festering conflict between the OR and systems thinking communities due to the paradigmatic debates between proponents of hard and soft systems thinking, while both are needed to address different problems (Midgley, 2000). Thus, Jackson & Keys (1984), concerned about the growing divide between practitioners, published a paper on complementarity. In the paper, titled *'Towards a system of systems methodologies'*, they argue that different methodologies are best suited for different problem contexts.

For instance, a unitary problem context is one where the decision makers are in full agreement about the goals they want to set out for the system. A pluralist problem context is one where decision makers do not agree on the set of goals and make decisions based on differing objectives. Additionally, the problem context can be either mechanical (complicated, so solutions are not obvious, but not dynamic or complex) or systemic (complex systems that manifest challenging and continuously evolving problems). Hence, there are four problem contexts – mechanical-unitary, systemic-unitary, mechanical-pluralist and systemic-pluralist. Each of them may be addressed by using different systems methodologies.

This is the basis for *methodological pluralism* (Jackson 1987). In his later work, Jackson (1991b) added a third type of context – a coercive one, where participants

are either forced to collaborate or one group silences another, as represented in Figure 4.2.

While musing on methodological pluralism, one cannot ignore the wider discussion of *theoretical* pluralism, as methodologies are informed by theories. All theories are limited. Their limits are dictated by the goals and values of their creators and the epistemic communities who apply them (Bhaskar, 1986).

Additionally, the utility of a theory depends on the type of intervention that is being pursued (Midgley, 2011). If partiality and preferences for certain theories are inevitable, then researchers are faced with a choice: either to stick to a singular theory or to accept the possibility of working with a variety of theories, values and ideas, which sometimes means having to reconcile their differences (Midgley, 2000).

PARTICIPANTS

	Unitary	Pluralist	Coercive
Simple	FUNCTIONALIST Systems Analysis; Systems Engineering; Operational Research	INTERPRETIVIST Strategic Assumption Surfacing and Testing	EMANCIPATORY Critical System Heuristics
Complex	STRUCTURALIST Lean Systems Thinking, Socio-Technical Systems, System Dynamics, and Organizational Cybernetics	INTERPRETIVIST Soft Systems Methodology	POSTMODERN SYSTEMS APPROACHES Participatory Appraisal of Needs and the Development of Action

(The vertical axis label reads: SYSTEMS)

Figure 4.2. The system of systems methodologies (Jackson, 1991b).

Still, the use of different theories that represent different philosophical streams would give more insights than the use of a singular theory. In any case, pluralism allows for a liberation from methodological isolationism and closed choice – either hard or soft, either first or second wave methodologies (Midgley, 1989a). Thus, Jackson and Keys's 1984 paper was one of the first attempts to unify the schism between systems practitioners and served as the foundation for the next, third wave of systems thinking (Midgley, 2000).

Critical systems heuristics

The other main development in the third wave of systems thinking is critical systems heuristics. Ulrich (1987) advocates "practical reason", which is about the moral or values-based justification of actions. However, in Ulrich's approach, the justification of actions does not rest with the involved actors only, but both with the initiators of change and with the ones affected by it. His ideas were heavily influenced by Kant's 'polemical employment of reason', advanced in the 1781 *Critique of Pure Reason* (Kant, 1781), and his *Practical Reason* (Kant, 1788)[14]. Thus, reason transforms from "monological" to "dialogical" (Ulrich, 1987, p 277).

In Ulrich's terms, systems thinking, in both the first and second waves, has been servicing instrumental (functional or technical) rather than practical reason (Ulrich, 1983; 1987). Ulrich recommends that systems thinking[15] must adopt a critical lens, where the critical systems designer reflects upon boundaries. He proposes a new approach for this – the *critical heuristics of social systems design*. In this new approach, the practitioner must strive towards transparency of the boundary judgements she falls back on. Indeed, one of the key conclusions of his

---

[14] As Ulrich himself refers to those editions of Kant's work, I have resorted to reading these translated and edited versions.

[15] In tune with the jargon of this period, Ulrich uses the term "systems science" (1987 p. 276). However, I have adopted the more contemporary label, Systems Thinking, which Ulrich came to later and is now fairly ubiquitous in the literature.

1987 paper is that the boundary judgements of the practitioner play a crucial role in her recommendations, and thus must be explored and not take for granted.

The reflection on boundaries and underlying assumptions should not rest with planners alone, however – it is important for the citizens, or those affected, to also perform critical reflection. Thus, the contribution of Ulrich (1983, 1987) to systems thinking is his call to turn our attention to boundary judgements and the need to openly discuss them.

The boundary critique

The attention that needs to be drawn to reflecting on boundary choices was further developed by Midgley in the 1990s in his advocacy of boundary critique (Midgley, 1992; Midgley et al, 1998; Midgley and Pinzon, 2011). Boundary critique can illuminate, not just the value judgements associated with different boundary judgements, but also how issues and groups of people can be marginalized in discussions and in processes of decision-making. For instance, one group may decide on a narrow boundary judgement (termed a 'primary' boundary). Another group may advocate for a wider boundary judgement, which will constitute the secondary boundary. Thus, the elements between these two areas – which are in the area between the primary and the secondary boundary in Figure 4.3 – will be marginalized from the primary boundary perspective yet included in the secondary boundary perspective.

The marginal area becomes a source of conflict between the two boundary perspectives (Midgley, 1992; Midgley et al 1998). This is because boundary judgements are informed by values, as affirmed by Churchman (1970) and Ulrich (1983) in his cogitations on critical systems heuristics. Thus, the primary and secondary boundary judgements are informed according to different ethical ideas or priorities.

 Midgley proposes that when the boundary perspectives come into conflict about what is marginal and what is central, their positions become stabilised by the assignment by participants of a sacred or profane status to marginalized elements.

Sacred and profane here mean valued and devalued (Midgley et al, 1998)[16], but Midgley uses these anthropological terms instead to emphasise the strength of feeling associated with these attributions.

When the marginalized elements are seen as profane, the primary boundary becomes cemented, as the elements included in it become the point of reference for decision making. People or issues within the secondary profane boundary are discredited, which allows decision makers to ignore them. In contrast, when the marginalized are granted a sacred status, the secondary boundary with its associated ethic is reinforced. This whole process of marginalization then becomes enacted in social ritual – as exemplified in Figure 4.3.
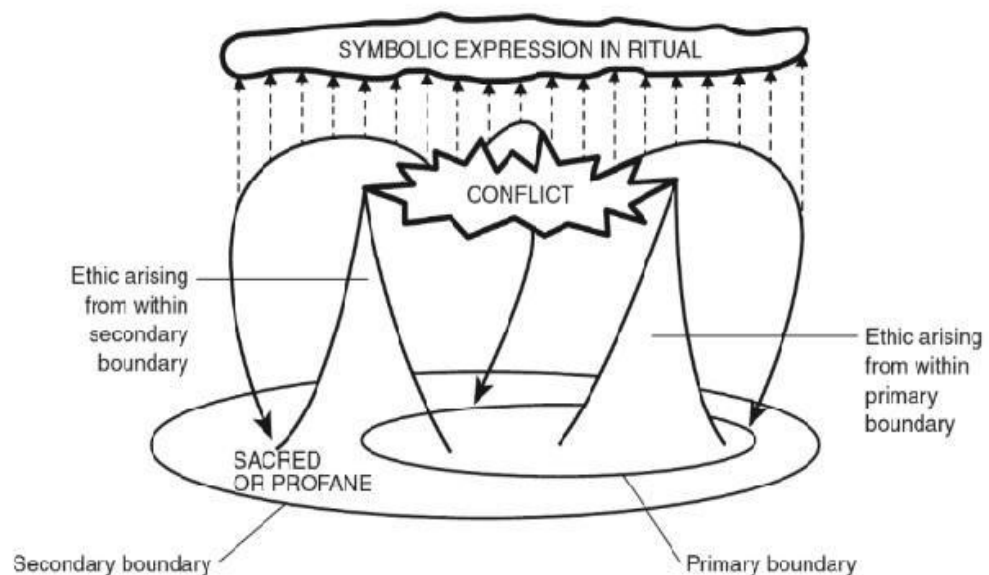
Figure 4.3. Margins, ethics, sacredness, profanity and ritual (Midgley, 2015, p 159).

---

[16] For a wider discussion on the sacred and profane refer to the work of British anthropologist Mary Douglas (1966).

In his later work, Midgley (2016) develops a theory of value conflict. The kernels of this newer theory can be found in the marginalization theory (1992). The theory of value conflict illuminates how the same phenomenon could have widely different interpretations depending on the perspective of a given stakeholder. Here stakeholder may mean an individual or a group, united by the same unique position towards the phenomenon under scrutiny.

Midgley (2016) affirms that the different interpretations of the phenomena are informed by differing value judgments. Values in this context are not ideals to aspire towards, but mean purposes that are actionable (Midgley, 2000; Yolles, 2001).
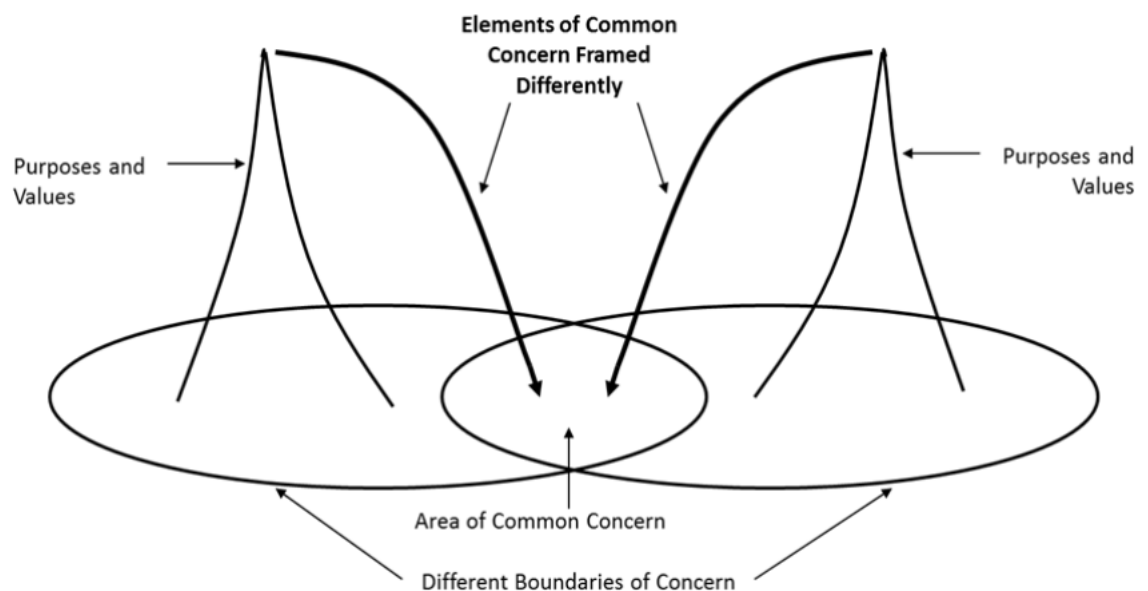
Figure 4.4. Systemic model of value conflicts (Midgley, 2016, p.2).

Figure 4.4 presents the model of value conflict where the two overlapping ovals are boundaries of concern of two groups of affected people, or people who have a stake in the situation at hand. The boundaries reveal the priorities and values of the stakeholders in question – what is important and unimportant and whose views should be regarded. Moreover, a boundary reflection also reveals what

informs the framing of the problem and its solution. Midgley (2016), however, offers three routes that can be followed when value conflict is being addressed:

> "[s]upporting people in transcending overly narrow value judgements about what is important to them; seeking to widen people's boundaries of the issues that they consider relevant; and attempting to challenge stereotyping and stigmatization by building better mutual understanding."
> Midgley (2016, p.4)

These approaches to dealing with conflicting values are exemplified with Midgley's real life fieldwork experiences. The present PhD involves legislation of the Muslim face-veil. The time is now opportune to remind the reader of the facts presented in the legal context chapter of this thesis. The face-veiling ban in Bulgaria, and the bylaws that preceded it, were adopted without consulting many of the stakeholders, and most importantly, without including Muslims – be they secular or practicing. It follows that the boundary judgements made at the time were informed from a narrow range of perspectives, belonging to non-Muslims and more particularly, members and supporters of the right wing party – the United Patriots. Hence, through a reflection on stakeholder perspectives and the decision-making that took place, I have come to the view that this theory of marginalization, and the wider theory and methodology of boundary critique it is part of, provide a suitable means to illuminate the effects of the ban upon the stakeholders who did not participate in its design and application.

Second generation of the third wave of systems thinking: systemic intervention

To refresh our memory, the third wave of systems thinking sought radical emancipation and critical reflection, as well as reconciliation between the first two waves. Thus, critical systems thinking hosted two influential, yet independent, schools of thought that were concerned, on the one hand, with boundary judgements (Ulrich, 1983;1987) and boundary critique (Midgley, 1992, 1998), and, on the other hand, with methodological pluralism (Jackson and Keys, 1984; Jackson, 1991b). In his work on systemic intervention, Midgley (2000) unifies the two approaches while also arguing for the creative design of methods (the

emphasis being methods rather than methodologies, in contrast with the work of Jackson (1987, 1991b) and other earlier third wave writers).

This unification is particularly useful for my research as I am interested in issues of marginalization, for the reasons explained on the previous page of this thesis, and Midgley's main contribution to the theory of boundary critique is his marginalization theory. Additionally, I am passionate about methodological pluralism, as advocated by Jackson (1991b) and further developed by Midgley (2000). No single methodology can deliver everything that may be necessary to complete a complex research project.

Different theories justify and inform different methodologies and methods and drawing on different methodological ideas and methods can be useful. Moreover, theoretical and methodological pluralism work in partnership in the design of systemic interventions (Midgley, 2011) and I have chosen to locate my research in this paradigm. Although the next chapter will review this in more detail, I have drawn upon multiple methods when completing my empirical work (such as interviewing, SSM analysis and reporting).

Systemic intervention is defined as "purposeful action by an agent to create change in relation to reflection upon boundaries" (Midgley, 2000, p 1). Midgley (2008) proposes that an adequate methodology for systemic intervention must include three main aspects: a boundary critique, theoretical and methodological pluralism and action for improvement.

The boundary critique involves a critical reflection upon boundaries as well as a conscious choice between boundaries. Boundaries are important as they determine who and what will be included in the analysis, as well as who and what will be excluded or marginalized. Boundary judgements are informed by values (Ulrich, 1983; 1987), so critically reflecting upon these is the way forward to anticipate the ethical consequences of possible actions. Second, Midgley (2008) explains that choosing a boundary also informs the theoretical and methodological approaches that could be useful. Since the understanding of reality may be bounded in different ways, then each boundary may suggest a different theory. Equally, every theory implies a boundary judgement. Hence, methodological and

theoretical pluralism become meaningful and useful when designing an intervention.

Third, a methodology for systemic intervention must be explicit about the action it wants to take towards improvement. Churchman (1970) warns that improvement has a fleeting character that is temporally and locally defined. Even if everyone affected by a said intervention agrees that it is geared towards improvement, this agreement will not necessarily hold true for future stakeholders, which makes the concept of *sustainable* improvement particularly important and challenging (Midgley, 2000; 2008).

The three dimensions of any systemic intervention are interrelated and inseparable. While the focus of an intervener may shift to one or another aspect of "this trinity" (Midgley, 2000, p 132), the other two are always potentially active and present and thus critical investigation of the possibilities for them becomes necessary.
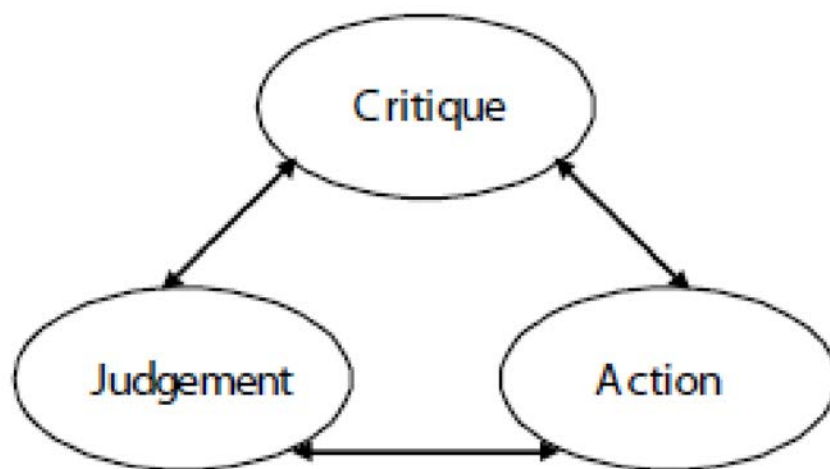
Figure 4.5. Three aspects of a methodology for systemic intervention (Midgley, 2000, p 132).

Figure 4.3 exemplifies the relationship between the three main activities in systemic intervention (Midgley, 2000). In the model, 'critique' signifies boundary critique, while 'judgement' refers to methodological and theoretical pluralism (judgement on relevant theories and methods). Finally, 'action' refers to what could be done to enable an improvement. These three are conceptually separated

for the purpose of explicit analysis, even though they are strongly interrelated, and this conceptual separation serves to remind the intervener of the three "angles" on the intervention (Midgley, 2000, p 132). Clearly, the first two components of a systemic intervention present a synergy between the main strands of the third wave – methodological pluralism (judgement) and boundary critique (critique).

Evidently, boundary judgements and boundary choices are an important part of systemic intervention. Midgley proposes that there are at least two processes of boundary judgement: directed outwards, towards the world; or inwards, towards defining the (individual, collective or wider systemic) self-giving rise to knowledge about the world. The former is a first order observation, while the latter is a second order observation, as proposed by von Foerster (1984[17]). According to Midgley (2000) there is always the possibility of a variety of first order and second order boundary judgements in any given situation and at any given time.

The main 'contribution' of systemic intervention that, for me, elevates it to a more favourable position than other systems approaches is, namely, the synergy between boundary critique, as elaborated above, and methodological pluralism. Systemic intervention calls for a reflection on values and boundaries, in order to consider issues of marginalization and 'tunnel vision'. Additionally, systemic intervention advocates for the creative design of methods and methodological pluralism. Perhaps the circumspect reader would benefit from a review of the philosophy that underpins systemic intervention, as it will illuminate the fundamental assumptions that are made by this systems approach.

Midgley (2000, p 78) calls this philosophy "process philosophy". This term has its conceptual roots in antiquity. Heraclitus famously remarked that nothing stands still; everything is in constant motion (Kirk, 1951). The movement of everything resembles the plasticity of an ever changing, ever renewing stream – it becomes impossible to enter the same river twice. The river has changed after the last entry and has the one who enters. Midgley's (2000) *process philosophy* differs from the

---

[17] For a detailed discussion please consult the following readings on first and second order observation: von Foerster (1984), Maturana and Varela (1987).

established process philosophers of the 20th century (such as Bergson, 1911; Whitehead, 1929; and Gare, 1996). While it has been claimed that the formal underlying assumption of process philosophy is that nothing is, everything is becoming (Helin et al, 2014), Midgley (2000, p 78) contests that 20th century process philosophers do not believe that "nothing is". Their ideas of becoming are rooted in other pre-existing entities that enable the process of becoming. For example, Gare identifies von Bertalanffy (1968) as a process philosopher because his open systems facilitate change: inputs are transformed into outputs and thus open systems are the "means of becoming" (Midgley, 2000, p 78).

However, Midgley's process philosophy moves beyond the primacy of a pre-existing entity that facilitates change. This is the main difference between Midgley and other process philosophers: his process philosophy does not rely on the existence of a single type of knowledge generating system [18] (such as von Bertalanffy, 1968), but instead what constitutes a knowledge-generating system in any given context is defined with reference to a process of making boundary judgements. As demonstrated by Midgley (2000), process philosophy is compatible with a variety of philosophical, epistemological and methodological theories.

Systemic intervention has not gone without criticism. Georgiou (2001) criticises Midgley's position on boundaries for being agentless - with judgements appearing from nowhere. Later on, Mingers (2006; 2014) expressed the same concern. Although not having composed a response to his critics himself, I have been privileged to gain insights on these criticisms directly from Midgley (2019) by way of personal communication. His view is that the criticism that boundary judgements are agentless misses the fact that Midgley (2000) clearly states that

---

[18] As discussed in the previous sections, all theories are limited by the goals and values of the people who develop and apply them, which also rings true for theorising types of knowledge generating system (Midgley, 2000). It is important here to clarify what is meant by knowledge generating systems. According to Midgley (2000, p 76), a knowledge generating system is "something that gives rise to the existence of knowledge through its own activity", for example language. Thus, Bertalanffy's open systems are a knowledge generating system.

boundary judgements should be *analytically* prioritised, but that doesn't mean they have *ontological* priority - i.e., there are indeed real agents producing boundary judgements, but understanding what these are requires second order boundary judgements – their nature should not necessarily be taken for granted (Midgley, 2019).

Luckett & Grossenbacher (2003) critiqued systemic intervention for its lack of objective and clear criteria to identify stakeholders, as this can lead to omitting important value judgements. The problem here, according to Midgley (2019), is that any criteria pretending to be objective (other than very general categories like the involved and affected) could actually be limiting, and even a term like 'the affected' can be open to interpretation. For instance, one person might only think about *human beings* affected by a given project, while another might consider wider *non-human environments* (Munday, 2011). Therefore, *defining stakeholders requires a boundary judgement that can never be absolutely objective.* This is why Ulrich (1983), Midgley (2000), Midgley and Ochoa-Arias (2004) and Midgley, Johnson and Chichirau (2018) all explain that exploring boundaries can make the identification of relevant stakeholders and issues *more* comprehensive than taking boundaries for granted, but *full* comprehensiveness (all-inclusive objectivity) is forever out of reach, as there will inevitably still be a boundary judgement involved in decision making on stakeholders and values. The best chance we have of being inclusive of different value judgements is not to pretend we can be objective, but instead to explore different perspectives and boundaries of who and what could be relevant to a project, keeping in mind that we inevitably have a limited perspective, so we constantly remain on the lookout for different possibilities (Ulrich, 1983).

Additionally, Jackson (2000) has criticised systemic intervention for having an imperialist version of methodological pluralism because it prioritises boundary critique. Midgley's (1989, 1990, 1997, 2000) response is that there is no 'view from nowhere', and every pluralist theory makes assumptions that are different from the works of the authors that the pluralist has learned from - which includes Jackson, who makes assumptions about the centrality of metaphor, for instance (Midgley, 2019). Midgley's (2000) view is that boundary critique helps with penetrating analyses prior to method choice/design, and so it is useful to have it

up-front. Failure to put something up-front that enables exploration in a way that accounts for power relationships risks an intervention design that misses or exacerbates problems. My own view is that these are all reasonable answers by Midgley to his critics, so basing my research on systemic intervention still makes sense.

Conclusion

Systems thinking is a vast field that has been used in family therapy, biology, ecology, engineering, medicine and the management sciences, among other disciplines. The present chapter contained a dense review of the main developments in the field of systems thinking for management science. As my research is into the consequences of the legislation of the Muslim face veil in Bulgaria, I have narrowed my review down to management science and stakeholder issues, with the occasional addition of other information where the historical review demanded it. I have expressed my paradigmatic choice, systemic intervention, while elaborating its characteristics and contribution to the wider body of work on systems thinking. The following chapter will discuss my choices of methods, which in tune with systemic intervention, is pluralist and creatively designed.

Chapter 5 : Methodology and methods

The State regulation of veiling is an intervention that constitutes a social phenomenon. Like most social phenomena, it can sustain many interpretations. The scientific interpretation of social phenomena requires the application of a technique or, more realistically, a set of techniques which translate the observed elements of reality into analytical concepts. The credibility of these concepts in the eyes of the reader will depend, to a very large degree, on the quality of my methodological precepts. In this chapter, I will explain why I chose certain methods and why I excluded others. As I asserted in the previous chapter, I have aimed at a creative design of methods, in tune with the paradigm of systemic intervention (Midgley, 2000).

It is best to summarise the main points at the outset. My research proceeds from a systemic interventionist standpoint: my central assumption is that the reality of face-veiling and its regulation is *created by human beings in a cultural context* rather than naturally occurring. Once these fundamentals are in place, it will be possible to proceed to discuss more concrete methods. It will be easier to introduce and justify my methods of choice once I have laid down the methodological foundations of my research. Specifically, method-wise, the research has used semi-structured interviews, thematic analysis and (innovatively) - soft systems methodology (Checkland, 1981; Checkland and Scholes, 1990; Checkland, 2000; Checkland and Poulter, 2006) for abstracting themes and analysing the various transformations that the face-veiling ban may have facilitated. The description of these techniques should equip the reader sufficiently to proceed to the analytical segments of my work.

The exposition is structured as follows: Part I is the present introduction; Part II elaborates how my research fits within systemic intervention and contains notes on my boundary critique and methodological pluralism as well as a discussion of isolationism. Part III again deals with methodological pluralism, more specifically with my design of methods. Part IV contains a conclusion and discussion.

Systemic intervention in action and knowledge

It is best to begin by defining some of the core terms of my inquiry. Midgley (2000) proposes that science and all knowledge-generating activities are value-full, in the sense that a researcher makes a value judgement on what to research: even if objectivity is claimed with respect to a given piece of research, the decision to undertake that research project and not another one on a different topic is inherently normative.

Perhaps the more controversial of Midgley's (2000) claims is that the primary modus operandi of research is intervention rather than observation. It is observation that has been the traditional focus of science (Popper, 1959, 1972; Fazey et al, 2018). In contrast, intervention is "purposeful action by an agent to create change in relation to reflection on boundaries" (Midgley, 2000, p 8) that determine the focus of research, whose views are engaged with, and what is included in (or excluded from) its remit. Intervention can be undertaken into one or both of two domains: action and/or knowledge. An intervention into action requires concerted efforts to actively bring about an improvement in a system. Whether or not an act can be considered as an 'improvement' depends on the values espoused by the agent who is intervening and/or other stakeholders making such judgements (Churchman, 1970; Midgley, 2011). The agent has a responsibility to consider who the stakeholders might be and what their perspectives are (Ulrich, 1983). An agent can be a physical person or an organisation.

My boundary critique

An intervention into knowledge, in contrast with an intervention into action, aims at improving the knowledge in a particular sphere without any direct attempt to change people's behaviours within systems (although stakeholders may decide to make such changes themselves after new knowledge has been accepted). In other words (and as I elaborated in the previous chapter), a systemic intervention entails a reflection on boundaries and relies on a plurality of methods (Midgley, 2000).

As an approach in systems thinking, systemic intervention most importantly reconciled the two main approaches in the Third Wave – the boundary critique and methodological pluralism.

Thus, when designing my own intervention, I placed the onus on identifying boundaries and on a creative design of methods. My boundary critique entailed identifying what is pertinent and non-pertinent to my analysis. In more concrete terms, as I endeavoured to discuss the ban with people who may be stakeholders in this intervention. I had to identify who from the Bulgarian population to approach. Recall that Chapter 2 aimed to acquaint the reader with the history of Muslim settlement in Bulgaria. I invited participants from all the main Muslim minority groups (Roma, Turkish, Pomak, Arab) as well as converts to Islam and the Gagauz people, who albeit non-Muslim are Turkophone people and historically are open to inter-marrying with Muslims.

As far as I am aware, no similar study of Muslim identity processes following a face-veiling ban exists. Unlike the kind of research-based intervention described by Midgley (2000), which considers different stakeholder perspectives, the face-veiling ban was an intervention of a different kind: it explicitly targeted Muslim identity processes and it was passed without consulting representatives of either the Muslim clergy or Muslim civil society organisations (the motivations behind the ban and the particularities of its context and actors are described at length in Chapter 3). Thus, in line with Midgley's (2000) systemic intervention approach, it seems suitable and necessary to include the perspectives of the Bulgarian Muslims and their attitudes towards the ban – which will give me clues about the effect it may or may not have had on their identities. Thus, among my respondents there are secular, devout Muslims and also people of the group who do not identify with any religion. I felt it was important to include a plurality of views from the spectrum of the main Muslim majorities as they were not consulted during the design of the legal intervention that constituted the ban.

As mentioned earlier, a systemic intervention carried out by an agent has two components: a purposeful action to create change and a reflection upon boundaries. I believe that, as an agent, I meet those two requirements in carrying out an intervention *into knowledge.* First, my goal was to create change in what is

known about Muslim attitudes towards the ban in general as well as investigate potential Muslim identity changes. Second, in my research I strove to reflect on the multiplicity of boundaries and the complexity of Bulgarian ethno-religious relationships. Additionally, I remained aware and conscious of my own perspectives and preferences.

My creative design of method: methodological pluralism

Sometimes, especially in the management literature, the terms *method* and *methodology* are used interchangeably, which is a practice contested by Midgley (2000) (also see Checkland, 1981 and Jackson, 1991b). The fallacy of using these terms synonymously is exposed by Midgley (2000) when he draws a distinction between their definitions. A method is a set of steps that is sometimes applied iteratively to achieve a given purpose, but a methodology is something else. Here, I need to discuss the classical and the systems views on methodology, as they are different. The classical and the systems views are in agreement that methodology is the body of theoretical propositions that underpins or grants validity to a given choice of methods. However, in the classical view, there is a hierarchy between philosophy, theory, methodology and methods, where philosophy is foundational and all the others are constructed in layers with methods dependent on the other three (Midgley, 2000). In the classical paradigm, a methodology precedes the choice of methods and serves as a heuristic device to help the researcher in deciding which methodical route to take.

Likewise, a philosophy precedes a theory, which then informs a methodology. The philosophy is therefore the foundation, so it's a priority to get it right. In the systems view, however, and particularly in critical systems heuristics (Ulrich, 1983) and systemic intervention (Midgley, 2000), philosophy, theory, methodology and method are not arranged in a strict order. Rather, innovation in any one of these may stimulate innovation in the others. Thus, Midgley (2000) is critical of authors, such as Fuenmayor (1991a, 1991b, 1991c), who concentrate so much on philosophy, thinking they are building the firmest of foundations upon which to construct their methodologies, that they neglect the possibility that the use of innovative methods

could actually feedback to change all the rest (methodology, theory and philosophy).

Methodology can be thought of as an epistemological toolkit – it facilitates an entry into the field of data, information and (most generally) knowledge. So, in systemic intervention, a methodology can inform the choice of methods, as in the classical paradigm, but it is also possible to first invent a method that seems a suitable route into knowledge, and then explore the methodological principles that would explain this suitability (see Boyd et al, 2004, for an example of a newly developed method that the authors call 'values mapping'). The following sections will briefly introduce the methods I have chosen and their suitability for my research. I aim to sketch my methods so that the reader can acquire a clear idea of what I have practically done. Since I agree that method, methodology, philosophy and theory can usefully be viewed as non-hierarchical, it is my belief that I should begin this chapter with the routes I took to access data.

However, I would like to make a remark here on the lexeme *data.* The Cambridge Dictionary defines data as information, mostly consisting of facts and numbers that can be processed to help decision making. Another meaning of data is facts and numbers that can be fed into a computer, which can store or use it for calculations. As I am dealing with mostly qualitative research (excluding some parts of my historical review and some statistical information necessary to present the features of Bulgaria), I feel rather uncomfortable referring to the conversations I have had as *data.*

My hesitation stems from several reasons. Firstly, I do not believe that human conversations should be treated as data in the narrow sense. Of course, the electronic recording of my conversations and their transcripts left a physical imprint that is reducible to symbols and numbers, but so do my thoughts as presented in this chapter. The words I type onto these pages could be seen as *data* in the narrow computational sense. However, I do not believe they are data in a broader sense: not only do I share information with my readers, but I also disseminate my knowledge and understanding of the world. Moreover, I share my insights gained through my knowledge and understanding. So did my respondents. The conversations I had with Bulgarian Muslims contained insights, beliefs and

lessons that people have learned. Hence, I will refer to the discussions I have had with people as *conversations*, not data.

Bearing these two observations in mind (that method, methodology and philosophy do not exist in a hierarchy and that my interaction with respondents is not just data), I will commence with my choice of methods. While presenting the methods, I will introduce the theoretical and philosophical paradigms with which they are traditionally associated. I will identify the incommensurabilities between these philosophies and, in this fashion, I will clarify the necessity of a novel systemic approach to philosophy - the idea of process philosophy in systemic intervention, as I have understood it from the works of Midgley (2000). Thus, my work espouses the ontology of process philosophy and the epistemology of methodological pluralism.

To refresh our memory, process philosophy accepts the existence of a variety of valid knowledge-generating systems (agents in context who can reflect on the boundaries of that context and hence their roles and identities). It is called 'process philosophy' because it advocates processes of exploring the boundaries defining both knowledge generating systems and the world they generate knowledge about methodological pluralism allows the creative design of methods to access the data and knowledge about the world that emerges from those systems. The following paragraphs will deal in depth with pluralism and process philosophy, their history in systems thinking and their fitness for my present work. After reviewing pluralism and making the case for process philosophy, I will spend some time on describing the methods that I have used. The chapter then will conclude with an overview of the key points raised and a summary of what follows.

Isolationism and its discontents

Since the mid-1980s, systems thinkers have criticised the siloing of methodologies. Some have called the belief that only one methodology is valid, 'isolationism' (Jackson and Keys, 1984; Jackson 1987). The same authors have called for its revision in order to advocate for reconciliation between warring systems thinking

camps[19]. Perhaps more importantly, methodological pluralism is at the heart of systems thinking as a whole, as it aims to transcend disciplinary boundaries and each discipline relies on its specific philosophical, epistemological and methodological precepts. Thus, to truly transcend disciplinary boundaries, we must become methodological pluralists (Midgley, 2011). Isolationism, Midgley (2000) proposes, is natural to humans as we are not impartial when evaluating a theory or methodology. Instead, humans tend to be passionate about theories and methodologies, especially when they have dedicated a significant portion of their lives to the development of just one.

Flood (1989) identifies two types of isolationism – methodological and theoretical. The former embodies the belief that there is one sole approach to accessing knowledge, ergo one sole valid approach to methodology. The latter – theoretical isolationism - embraces more than one method, but it is legitimised by a single theoretical worldview, which allows for a degree of complementarity, but only to a limited extent. Flood (1989) views methodological isolationism as static and reductionist, with theoretical pluralism thought more plausible. Flood (1989) warns that those who follow a sole theory are prone to excluding and avoiding different perspectives. Jackson (1987) reviews the development of systems thinking, identifying the shift between 'hard' positivist and 'soft' interpretivist approaches. Jackson's original study dates back to the eighties, but in his later work, he adds a third, emancipatory approach to systems thinking (Jackson, 1991a, 1991b).

This new emancipatory school embraced Jackson's argument for methodological pluralism– there was a pressing need back in the late 1980s and early 1990s for a reconciliation between the different hard and soft approaches, to avert the 'crisis' in systems thinking (a paradigm war) that was tearing the research community apart. Jackson (1987) proposes that, due to the diversification of systems thinking (hard systems thinking talking about objective inquiry into the nature of a real world; soft systems thinking rooted in the ideas of intersubjective understanding

---

[19] The debates between First and Second Wave of Systems Thinking were thoroughly reviewed in the previous chapter.

and collaborative action; and finally, critical systems heuristics which is concerned with identifying power relations and has emancipation at its core), it is becoming hard to find reconciliation way to reconcile them.

Jackson's early observations of then-recent changes in systems science informed his prediction of four possible developmental routes: pluralism (accepting all methodologies as valid for different kinds of problem), isolationism (believing only one methodology can be valid and seeking to delegitimize the work of opponents), imperialism (believing only one methodology is valid, but cherry picking methods from others and reinterpreting them through the preferred methodology) and pragmatism (dispensing with all theoretical understanding and just doing what superficially appears to work in practice). Jackson (1987) contends that all but the first of these will impede the science and practice of systems thinking, while the first option – pluralism – is viable. The critique of isolationism advanced here is the bedrock of Midgley's pluralism (Midgley, 2000), although there is one key criticism that Midgley (1989a, 1989b, 1996) makes of Jackson's work: Midgley says there is no paradigm-neutral space from which to operate pluralistically, so inevitably pluralism is a new paradigm (making different theoretical assumptions to isolationist paradigms) that actually operates in practice a little like Jackson's imperialism. Midgley (1989a) therefore argues that the distinction between pluralism and imperialism needs to be discarded.

At this juncture, it might be desirable to expand on some of the notions that I have set out in the preceding paragraphs. Pluralists are not relativists without limits and theoretical preferences (Midgley, 2001). Instead, pluralists are aware of their ontological assumptions, they explicitly state their theoretical positions and the justifications of the use of each selected method. Pluralists view methods as *complementary,* as they address different kinds of questions. For example, the present thesis uses a variety of methods to answer questions that vary considerably in both their character and their context. In the first chapters, I have presented a factual report concerning the legislative process in Bulgaria, and a factual account of the history of ethno-religious relationships in Bulgaria. These chapters addressed questions of content – what *is*. In this sense, I tried to say what *is* the existing body of knowledge on ethno-religious relationships and also what *is* the procedure of   passing legislation. To supplement these factual chapters, I have

provided a set of timelines. This kind of reporting is congruent with a neo-positivist[20] 'hard' research traditions, as it seeks to include only propositions that are widely accepted as objective. However, I have also used semi-structured interviews, which are traditionally seen as an interpretivist method. Both reporting and interviewing are fairly common and are seen as traditional methods of scientific inquiry in their respective paradigms. The method of interviewing answers another type of question from reporting – one concerning attitudes and perspectives, a qualitative question about my respondents' thoughts about the ban. To further my understanding of identity processes, however, I did not stop at the traditional methods of scientific inquiry. They tackle content (what are the facts? What are people's perspectives?). I am interested in process too (how can I make more systemic sense of the conversations I have had with the participants?).

Creatively designed methods

Throughout this PhD project I have tried to determine whether and how the ban has affected social processes in general and individual identity processes in particular. My research is placed in the systemic intervention paradigm, which, to refresh our memory, unites the two streams of the third wave of systems thinking – the boundary critique and methodological pluralism. A key aspect of pluralist systemic research is the creative design of methods (Midgley, 2000, 2011). My

---

[20] Inspired by Midgley's (2000) cogitations on positivism, I chose to use the term 'neo-positivist' as opposed to merely 'positivist'. The reason behind my choice is that although management researchers commonly use it, the actual end of positivism came in the 1930s, with Popper's demolition of the positivist school's belief that there could be certainty about our knowledge of the world. It was only by 1959, when Popper's book was translated into English from the original German, that there was no longer any credibility in positivism. Hence, according to Midgley (2000) what people we now call 'positivism' is not actually the pre-1930s positivism. This is why Professor Midgley calls it 'neo-positivism'. It follows that Popper is a neo-positivist as he still aspires to reach the ideal truth, all the while realising the limits of the discovery as a new information that can trigger a complete shift in knowledge is always possible, like the black swan that follows the white flock.

methods included semi-structured interviews, factual reporting and soft-systemic thematic analysis.

Pluralists do not figure-skate on the surface of impenetrable silos, only to draw an intricate, yet shallow sketch. Pluralists do not contend that all methods are equally valid and suited for all occasions (Midgley, 2001). Instead, we build a philosophical perspective that explains and permits plurality of thought and method, and this involves questioning which of the foundational assumptions of other philosophies need to be accepted by ours, and which need to be rejected because they maintain isolationism (Midgley, 2000). Only then can we propose a harmonised philosophical perspective that enables enjoyment of the "variety inherent in the multiplicity of competing isolationist paradigms" (Midgley, 2001, p 380) without actually succumbing to the isolationist elements of them. The following paragraphs will illuminate my choice of method and the purposes it served. I have commenced my data collection with a broad, open question – what the systemic effects of the face-veiling legislation are, bearing in mind that the context binding my question is individual identity formation of Bulgarian Muslims.

Thus, the central question that I seek to address in the present thesis is this: what are the systemic effects of the face-veiling legislation in Bulgaria on Muslim identity formation? In order to address this question, I have separated it into several sub-questions, the purport of the separation being to answer different questions through different methods. Investigating the systemic effects involves knowledge of the 'system' – or the network of Muslim identities in Bulgaria. Moreover, it requires specific, technical knowledge about the intervention – the legislative process in Bulgaria and the particular political and social context of the legislation passed. To address this part of the question – the history of Bulgarian Muslim identities and their relationships and the legislative process and its political environment, I have deployed a factual reporting method.

Furthermore, to scrutinise Muslim citizens' attitudes towards the ban, I have used semi-structured interviews. There are other methods of receiving information straight 'from the horse's mouth', such as lightly structured interviews, questionnaires, experiments, workshops, and so on. Semi-structured interviews allow the investigator some freedom of inquiry and engagement. The conversation

has greater flexibility than a structured interview or a questionnaire. A lightly-structured interview, on the other hand, allows even greater flexibility, but its free nature might eventually dull the sharpness of the inquiry. Finally, experiments and workshops are interesting ways of receiving data, but they require time and funding that I, as an early-career, PhD researcher, simply do not have at my disposal. Semi-structured interviews seemed like a good compromise between freedom and structure: they allowed a good blend of targeted questions, plus additional, follow-up questions depending on what my respondents were sharing. It was my aim to create an atmosphere of dialogue and the general sense of having a discussion, rather than an interrogation.

To complete my systemic intervention in knowledge, I have applied an approach from the systems thinking toolbox that belongs to the second wave – soft systems methodology. Its traditional use is for organisational change through mutual learning between participants with different perspectives (Checkland and Scholes, 1990; Checkland, 2000). SSM investigates possible organisational transformations – desired and desirable changes rooted in different perspectives – and compares these, to test for feasibility, with what we know of the current situation. On this occasion, to investigate the transformations that this face-veiling legislation may or may not have triggered, I borrowed tools from systems thinking. I used a part of the third stage in SSM – "Root definitions of relevant systems". Recall that before the root definition is composed, there is a CATWOE (Checkland, 1981, p 163). Later, the CATWOE was replaced by a BATWOVE stage in Midgely's and Reynolds' applications of Checkland's soft systems methodology (Midgley and Reynolds, 2001, 2004). The BATWOVE stage of SSM scrutinises the desirable future organisational transformations from the viewpoint of a stakeholder.

Thus, the BATWOVE presents a perspective on a transformation. Its use enabled me to 'open the transformational black box' of Muslim identities in post-face-veiling-ban Bulgaria. I performed this analysis by identifying the power structures behind each transformation, the socio-political environment of each transformation and the worldview that inspired each transformation. Later in this chapter, I will return to this novel use of SSM. I will spend more time guiding the reader through the history and conventional use of the methodology. Finally, in

the next chapter, which will contain analytical insights, I will demonstrate how SSM can inform thematic analysis of identity processes.

As I said, I place my research in the systemic intervention and pluralist paradigm. To achieve a systemic intervention in knowledge, I draw methods from the qualitative social sciences – semi-structured interviews, thematic analysis and reporting. In the following paragraphs, I will focus on the resources that I have drawn from qualitative research to design my intervention. The findings are discursive and abducted from communications about my respondents' lived experience. An attempt is made to abstract them through conversations with individuals who are directly affected by the burqa ban in Bulgaria. I do not claim that the generalisations made are immediately transferrable to other populations. However, they serve to reinforce the validity of the wider theoretical framework that is developed in these pages; a systemic insight into identity formation, which I hope will be transferrable to different contexts where the State regulates identity expressions.

Before embarking on a defence of the choice of methods, it might be useful to elaborate, briefly, on the concept of qualitative analysis. Qualitative research is oftentimes negatively defined: it is researching whose foundations rest on non-numerical data (Flick, 2017)[21]. In developing their inquiry, the researcher is not

---

[21] The purpose of much research is the production of generalisations. A general proposition may or may not be true when applied to a specific population. The truth-value of the proposition only matters if it can then be transplanted to some other population. In the "hard" sciences, transplantation is thought to be achievable if the criteria for external validity are met (Kuhn, 1962). For instance, Newton's observation of apples falling could – and was – explained by the existence of a force that attracted those apples to the ground. That explanation was scientifically meaningful because it could be applied, not only to apples, but also to buckets, buildings, clouds and planets. It was valid externally. The same criteria do not and cannot apply to qualitative research. Suppose that it is found that burqa bans elicit anger in Bulgaria in 2017. That finding can never establish incontrovertibly that a burqa ban would elicit anger in, say, Italy in 2087.

Does this make qualitative findings unscientific? I do not think so, for several reasons. Firstly, the Bulgarian finding might be *indicative* of the outcome of a study to be conducted in Italy in 2087. That would depend on the socio-economic context of Italy in 2087. Insofar as that context will

restricted to formal logical operations. Narrative, symbolism and metaphors are permissible foundations for broader theoretical propositions (Elden and Chrisholm, 1993). In addition, textual analysis drives abstractions. The rules of statistical sampling are not applied. Moreover, the selection of observations is purposive, not random. It is important to add another distinction: between exploratory and confirmatory research, which is a juxtaposition studied by Stebbins (1997; 2001). Exploratory research relies on imagination and open-mindedness, while confirmatory research is rooted in pre-established notions and relies on confirming or disproving pre-constructed inferences (Stebbins, 2001).

Exploration in qualitative (and quantitative) research should not be equated with exploration in the broad sense of accidental discovery – it is a systematic and pre-planned venture. The explorer goes out in the field with some theoretical and methodological 'equipment', but the design of this equipment is not as crucial as in confirmatory research. In confirmatory research, the design of methods is paramount: including sampling and processing of data. The goal of this type of inquiry is to test hypotheses and the success of this test depends upon the quality of the methodical design. By contrast, the goal of exploratory research is to

---

likely bear some semblance to that of 2017 Bulgaria, we may expect the earlier finding to be transferable to some extent. Secondly, the Bulgarian finding is likely to corroborate some general theories about burqa bans and to challenge others. However, this is not the main aim of my work, and the consequences for established theories will be secondary. My primary goal is to lay down the groundwork for a systemic theory of identity. Moreover, systemic research engages with lessons from case studies that feed into general theories. Over time, the accretion of qualitative findings is likely to result in the emergence of a more-or-less stable body of theory on the subject (Noblit and Hare, 1988). As that theory grows more robust, so will its explicative power. Consequently, the 2017 finding will contribute to the evolution of a theory which, by 2087, might be able to provide better insights in identity formation across populations. In this sense, knowledge is cumulative (as discussed by Popper, 1959), although there is always the possibility, sometime in the future, of a transformative research finding that completely changes the paradigm in which identity formation is being understood, and this kind of paradigm change can stimulate the production of a new knowledge formation that breaks away from the old cumulative one (Kuhn, 1962).

generate new ideas, new understandings of reality – such as those emerging from grounded theory (Glaser and Strauss, 1967).

My systemic intervention into knowledge is a form of exploratory qualitative research, as it hinges on finding out the marginalized or even excluded perspectives of my respondents, which (as far as I am aware) have not been researched before. As mentioned, my research concerns identity formation and burqa bans. Theoretical predictions about the emotional impact of the burqa ban are – it is thought understandably – extracted from the emotions that the burqa ban provokes in those affected by it. Emotions are not immediately observable from the texts that the interviews yield. However, I still retain the memory of my emotional engagements with the participants, and this memory drives my interpretation. Interpretation, as a derivation method, is not objective (Walsham, 2006). It cannot be conducted without input from the observer *qua* observer. Again, this may be contrasted with the approach that typifies the natural sciences and many of the social sciences.

There, the observer's function is said to be limited to recording data. The data is then compressed into some tractable index, such as a number. The mass of numbers that the observer has collected is treated statistically to identify mathematical regularities. The corroboration or refutation of the hypotheses depends on the patterns thus isolated. So long as the conversion of observations to numbers follows a widely-accepted method, the process is said to be as near as we can get to objective; that is, an understanding uninfluenced by the particularities of the observer (Douglas, 2009). At the end of the day, however, objectivity is a judgement made by a community of scientists evaluating the method and its findings: method alone cannot guarantee objectivity (Popper, 1959).

The following section will discuss the specific methods that this study deploys. The general approach is to a very large degree informed by soft systems methodology, and in particular the works of Peter Checkland (Checkland, 1981; Checkland and Scholes, 1990; Checkland and Poulter, 2006). This methodological system provides a way of thinking about problematic situations and the transformations associated with them but needs substantive engagement with participants for its

implementation. I am using SSM creatively in order to study the transformations that the burqa ban in Bulgaria may have triggered in identity formation processes. As a systemic intervener in knowledge, I have approached the field with a pluralistic methodology, inspired by process philosophy. I rely on semi-structured interviews that were conducted in Bulgaria in July and August 2018. The insights my conversations yielded are analysed by means of thematic analysis: codes are identified through interpreting respondents' answers and then used to detect themes, which are then collated into patterns, with those patterns serving as a reference point for the broader analytical inquiry. Below, each method will be discussed in turn.

Semi-structured interviews

It goes without saying that the present study deploys specific techniques directed at the elicitation and analysis of data. It must be conceded immediately that these terms sound very dehumanising when in fact they are used to describe information shared by human participants. Elicitation corresponds to the 'finding out' stage of soft-systems analysis described in the preceding section. Here, it took the form of semi-structured interviews or, more accurately, conversations. Presently, I will briefly overview that technique and discuss some of its advantages, as well as some of the measures taken to minimise its disadvantages. Mixing interviewing with the methods from SSM is an example of the creative design of methods in systemic intervention (Midgley, 2000).

The reader will recall that one of the fundamental epistemological assumptions that drives my research is that there is a wide array of knowledge-generating systems and that methods that seem to be working should be used – it is not an issue to explore their theoretical underpinnings post-use (Midgley, 2000). 'Finding out' about marginalization and identity formation entails interacting with the marginalized and with those who resist marginalization. Several techniques can be deployed to achieve this, ranging from questionnaires to participant observation. There is, in this respect, a trade-off between analytical tractability and contextual detail. A simple questionnaire allows for the aggregation of many responses and their treatment through statistical means. Long-term participant

observation of the kind seen in ethnographical studies limits the size of the sample considerably, but it yields very rich pictures of the field under observation.

Semi-structured interviews strike a balance between the two extremes. A semi-structured interview is one in which the interviewer approaches the respondent with a set of questions in mind but permits new ideas to be explored as the conversation unfolds (Doody and Noonan, 2013). This has two obvious benefits. The first is that some of the questions that all respondents answer are identical. Their answers can be compared directly. The second benefit derives from the open-ended nature of the interview. Conversations generate rich, context-sensitive pictures of the respondents' conceptualisation of the problem situation. This, in turn, permits the analyst to arrive at a more accurate representation of the way respondents construct the reality of burqa bans, marginalization, and their own identities.

The foregoing should not be taken to mean that semi-structured interviews are the "optimal" mode of eliciting information about a problem situation. They still yield a smaller sample than structured interviews. They also yield less context than long-term participant observation. The appropriateness of semi-structured interviews, like that of all methods, depends on the analytical task at hand (Jackson and Keys 1984). Why, then, is identity formation in the context of marginalization suitable for examination through semi-structured interviews? The soft-systemic approach focuses on worldviews and conceptual models. As Checkland and Scholes note, it is very difficult to approach a messy problem if discussions are wholly unstructured (Checkland and Scholes, 1990). Participants are likely to speak at different levels of generality, generating confusion. At the same time, the social-constructivist assumptions that inform this study (and SSM in general) mean that a great deal of emphasis is placed on worldviews. The assumptions and intentionalities that underlie worldviews can never be understood within a rigid, structured exchange – human inclinations and prejudices are so infinitely varied that they can only be discovered, partly, through interpersonal exchange.

The semi-structured interview method permits me to build worldview-informed conceptual models. The pre-defined structure of the interview corrals the respondents into speaking at similar levels of abstraction. That the inquiry is partly

open-ended facilitates an assessment of context, which teases out the formative preconceptions of each respondent's worldview. These two considerations, taken together, mean that semi-structured interviews are a good way of finding out about marginalization.

The use of semi-structured interviews is not without risks. The first danger is one that looms large in any empirical research in the social sciences: the analyst's own views may overly influence interviewee responses. This tendency, if unchecked, would yield results that reflect my own worldview, rather than that of the respondents. While perfect objectivity with regard to different human perspectives is unobtainable (as Gregory, 2000, argues with regard to systems research, nobody can completely stand in another's shoes), measures can still be taken to minimise the *over*-intrusion of the researcher's own worldview. Three measures were taken in this study to address the problem.

First, every effort was made to ensure that interviewees felt at liberty to express their own views, even if they contradicted my own or those that held sway in their milieu. They were reassured that only I will listen to their recording and nobody else will access their personal data. Participants' oft-expressed desire to be reassured was also an important lesson to me as a researcher. The first two interviews I conducted, although rich in information, were not useable. The participants withdrew from the study shortly after our conversations. Their reasons were anxieties over confidentiality. It had been my view at the time that I had taken all reasonable steps to ensure respondents' comfort, safety, and confidence.

I was thus surprised to discover that my attempts to assure respondents of the confidentiality of our discussions were inadequate. From then on, I was very careful in facilitating a conversation where the respondents felt safe to convey their perspectives, irrespective of whether they were congruent with my views or the views of their immediate family and acquaintances. The extent to which these efforts were a success, of course, depended on my communication skills. To the reader, those are wholly unverifiable. My self-assessment, too, is likely tainted by confirmation bias. However, I think that the responses reflect a wide diversity of views, which offers at least some indication that they were proffered freely.

Additionally, I only had two more respondents withdraw from the study – one after being interviewed and the other shortly before our meeting. To me, this attests to the veracity of my belief that the other thirty respondents felt safe and free to express their views and feelings during our conversations.

The second measure that I took to avoid influencing my interviewees was to abstain from asking leading questions. Again, the diversity of the assumptions of the respondents evinces, to some degree, the absence of unconscious framing. Moreover, I adjusted my attire when entering temples or talking to conservative Muslims. Conversely, I wore 'Western' clothes when speaking with secular Muslims.

The last measure that I took was to acknowledge the possibility of my own perspectives spilling over into the thesis. This, in turn, should enable researchers – and those readers who find the study credible – to account for any possible perspective when they use my findings in the future. Whenever, in my conversations, I distinguished an attitude of support for, or rejection of, a social group on the part of the interviewee, I specifically inquired about it. Suppose respondent X belongs to group A, and vehemently defends her difference from social group B. In such instances, I would inquire about her experiences with members of social group B, so as to distinguish between attitudes that are founded solely on what the interviewee had heard from others and attitudes reinforced by personal experiences.

The other major risk in conducting interviews of all forms is that respondents will not share their true feelings; they might abstain from expressing their unisubjective truth, in Foucauldian terms (Foucault, 1972). That risk is particularly prescient in the present study – one pernicious effect of marginalization is mistrust of strangers and out-group members, including researchers. Moreover, some of the questions were aimed at unearthing subjective views about conduct that is now illegal in Bulgaria. Both factors exert a strong pressure on respondents to tell untruths, either to minimise perceived legal risks or to ensure that I have heard what I wanted to hear. Mindful of that danger, I took two measures to counteract it. The first was to ensure that responses remained confidential and anonymous. The respondents were informed of this and

oftentimes during the conversations I was asked to turn off the recording device so that the respondent could go off-record. In some cases, after reassurance, the respondent would return to the record and repeat their statements. Other times I was left only with my handwritten notes after the conversation, and I had to clarify with the participant whether I still had their permission to draw upon them for my research. Those who were doubtful were reassured, sometimes at great length, as mentioned.

My application of SSM

In '*Systems thinking, systems practice*', Checkland (1981) asserts that SSM, although structured around seven stages, could be deployed very flexibly. For instance, a project could start at stage 4. Additionally, my research belongs to the systemic intervention paradigm, where the mixing of methods is welcome, as long as it is justified (Midgley, 2000).

Checkland's approach focuses on the stakeholders (Checkland and Scholes, 1990). Accordingly, I will verbally describe how a stakeholder is nested within the problematic situation. In the course of my discussions, it became apparent that all respondents placed themselves or explained to me their position in relation to the face-veiling ban. This mode of discourse required them to supply much of the context. For example, a young independent woman had previously dated a very conservative Muslim whose family members wore face-veils. Due to differences in their respective lifestyles, the relationship collapsed when he was married off to a girl in a face-veil. This unfortunate turn of events affected my respondent's attitude towards the practice.
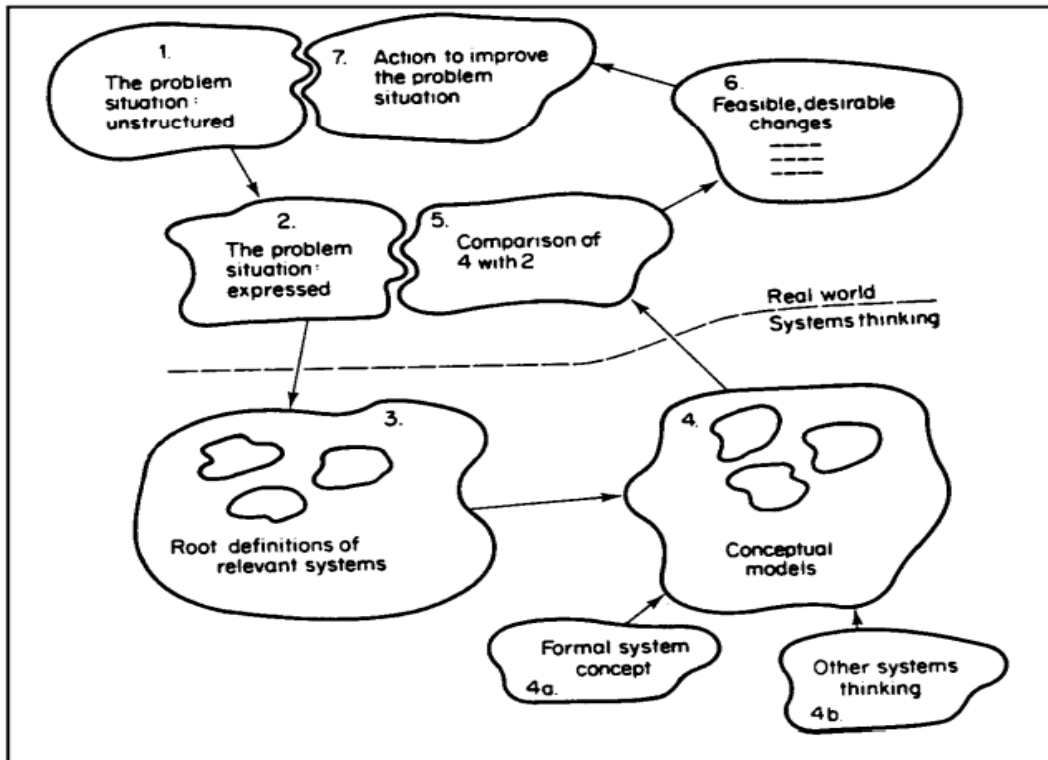
Figure 5.1. SSM: the seven stages adapted from Checkland (1981), p. 163.

As I will follow the BATWOVE formula for each respondent and study the various power structures, social norms and interpretations of the transformations identified by my participants and triggered by the 2016 face-veiling ban. Soft systems methodology is especially useful for the analysis of intersubjectively socially constructed realities. This is so because soft systems methodology encompasses – and indeed mandates – the use and construction of several BATWOVES, depending on the number of identified perspectives. Additionally, neither of which is assumed to be more or less valid than the others.

Now that the contours of soft systems methodology and my intention of using it are in place, it is necessary to highlight two issues of wider methodological significance. Both pertain to the choice of soft systems methodology over other social scientific approaches. Recall that in the preceding section of this chapter, I said that the reality of marginalization is socially constructed. What I meant by this is that the content of marginalization as a concept is determined by the subjective experiences of the marginalized and not externally, by a power structure that monitors identifiers of marginalization. The soft-systemic approach permits

me to derive several perspectives on identity formation and marginalization and to use them in conjunction to suggest actions for improvement. This would not be permissible under a "hard" systems approach. Under that paradigm, the world is conceptualised as a set of interacting systems that can be designed and optimised by an objective observer (Checkland, 1981).

A second, and related, point is that soft systems methodology coheres with identity formation and marginalization as phenomena because it encompasses different worldviews. Burqa bans reflect boundary judgments – a politically powerful group judges a form of religious expression unacceptable and attempts to limit it. It is an example of drawing a boundary between the sacred and the profane, heavily invested with values that the State upholds (Midgley, 1992). Marginalization, too, reflects a subjective judgment – an individual perceives himself as being outside of the bounds of a layer of society. However, marginalization is always ambiguous – the marginalized person is outside one boundary but still within another. If the person is outside society, this would make them non-existing for the system. That is exclusion, not marginalization (Midgley, 1992). Evidently, the formation of those judgments is not path independent. When the powerful political group comes to judge burqas as unacceptable, it does not do so because it has encountered burqas (or Islam) for the first time and approached it as one would a mathematical problem. Instead, the decision is made on the basis of certain beliefs that have long been internalised. Similarly, when an individual experiences marginalization that is likely to be the product of long-internalised experiences of alterity.

I have creatively used BATWOVE to 'unpack' the transformations triggered by the face-veiling ban as perceived by each respondent. I reviewed the changes that have happened (real world recent history) in terms of transformations. This is a novel take on SSM as originally, Checkland (1981) envisions that during the CATWOE stage, the participants themselves express views on future transformations. Thus, the original applications of CATWOE (Checkland and Scholes, 1990) and BATWOVE (Midgley and Reynolds, 2001, 2004) are future-oriented and serve as participatory system redesigning tools.

Using the BATWOVE to explore attitudes towards the ban and the transformations associated with it contrasts with the original version of SSM in another, crucial way. Recall that in SSM there is a line that demarcates the real world from the world of ideas, or the systems thinking world (Figure 5.1) It follows that there needs to be a clear separation between these worlds and the stages that reflect them. For example, the BATWOVE belongs to the 'systems thinking world' of possible transformations and the interviews and rich picturing are both part of the 'real world'. However, by utilising BATWOVE to extract knowledge about the real world, as understood by my respondents and interpreted by me, I am going against the postulates of SSM.

I hinge my defence of methodological innovation upon the arguments presented by Midgley (2000): researchers are free to reinterpret methods and use them in ways their creators never intended, as long as this is justified. Foote et al's (2007) paper on boundary critique and problem structuring (in JORS), where Professor Midgley participates, he argues about the use of rich pictures to show best case and worst-case futures. Such use of rich picturing is in contradiction with what Checkland intended. Traditionally, rich pictures describe everything that relates to the present situation, they do not facilitate visions of the future.

Thematic analysis and SSM

This section reveals how I integrated thematic analysis into the SSM methodology. In the present study, soft systems methodology guides some of my interpretations. The conversation with each participant will be subjected to a retrospective BATWOVE analysis, which will aid the formulations of transformations pertinent to identity. As Checkland and Scholes (1990) put it, the SSM helps stakeholders envision and express changes that must be systemically and culturally acceptable. Perhaps respondent X would suggest that banning the veil is indeed a desired change, but the implementation of the ban should be altered. This already provides a recommendation for improving the current system. The reader will recall that the usefulness of the soft-systemic approach for the study of identity formation and marginalization was defended in the discussion of soft systems methodology above.

Semi-structured interviews cannot, on their own, complete the analysis. They can only yield data. Data do not speak for themselves. Nor can the respondents' answers easily be 'fed into' the soft-systemic framework. My respondents – like any selection of human beings – conceptualised their realities in very different ways. Accordingly, the interviews, if taken in their 'raw' form, would yield numerous BATWOVEs which would evidently be a hindrance to my research. For this reason, the data is organised based on various 'transformations' that the ban may have evoked. By focusing on the transformative effect of the ban, I have not limited the BATWOVEs to only transformations that have to do with the said legislation.

In my boundary critique, I have decided to include any transformation that the respondent has experienced and shared with me, even when there was not a discernible relationship with the ban. The reason behind my decision to broaden the boundaries of possible transformations is that everyone I invited knew in advance what the topic of my research is. Through the consent forms and my explanations, the respondents had a clear idea about my research interest. Furthermore, my participants wished to share these transformations with me because a conversation about the face-veiling legislation brought these experiences to the fore – hence these seemingly irrelevant transformations are relevant for my research.

I have followed the sequence as "TWBAOVE" (transformation and worldview that informs it, beneficiaries, actors, owners, victims and environmental constraints) (Midgley and Reynolds, 2004, p 15). After performing one or several BATWOVEs per data segment, I will use the results to look for emergent codes which will feed into themes. For example, respondent X experienced a transformation pertinent to her identity when she converted to Islam. She experienced a positive change in her life and is certain that after converting to Islam the youth stays away from drugs and criminal activities. Missionaries reached out to her village and gave out books and Islamic garments. In this case the transformation from state A to state B would be from non-Muslim to Muslim, the beneficiaries are the local community, the actors are the missionaries, the owners are the organisations that employ them, the victims are the criminal bosses and so on. Consequently, each of these codes

will be supplemented with at least one quotation, to evidence what inspired my coding.

Thematic analysis, as a technique, is well-established in the social sciences. In this sub-section, I will briefly overview it; thereafter, I will highlight two central problems with the use of thematic analysis and the measures that were taken to address them. Thematic analysis, in its most common form, is inductive. The analyst, upon collecting primary data, is left with a large mass of textual information. The raw information cannot serve a useful purpose – it must be organised. The first stage of thematic analysis involves the deployment of codes (Braun and Clarke, 2006). Codes are simple analytic units – whenever a respondent utters a particular word, phrase, sentence, or whenever the respondent mentions a particular issue, the analyst records the instance as the occurrence of the code. Codes must necessarily be somewhat more abstract than the level at which conversations occur.

Because of this feature, they capture statements made by multiple respondents. For example, if one respondent describes the victim V in BATWOVE as her brother being questioned by the police over his religious affiliation and another describes being fined for wearing a veil, both V designations from two separate BATWOVEs may be coded as "interactions with law enforcement". It must be noted, further, that the codes do not attempt to be evaluative and they should bring a little context with them so that it is possible to make sense of the code, without it being too abstract and general (ibid).

In the second stage of the analysis, the codes are grouped into themes. Themes are expressed at a higher level of abstraction than codes. To use Braun and Clarke's (2006) analogy, codes are to themes what bricks are to walls. For instance, the "interaction with law enforcement" code described above may form part of a theme such as "perceived oppression". This process of data reassembly is also driven by interpretation as the analyst attempts to interpret patterns within the codes. The concept of a pattern here denotes a (more-or-less) robust logical relationship between two codes which recurs across interviews (or, in the case of the present research – BATWOVEs). The conversion of codes into themes is fraught with analytical peril. For instance, it is important to reassemble the information into

units that are useful - utility is a judgement on purpose, so it drives interpretation. That is, ones that aim at solving the research question – in this case: what are the systemic effects of the face-veiling ban upon Muslim identity formation? At the same time, themes must be tractable – it must be possible to delineate them. It is also important to ensure that each theme is supported by a sufficient volume of information. For instance, if one of the interviewed individuals reports hostility by the police, that statement may plausibly be converted into an 'oppression theme. However, if none of the other interviewees refer to instances of oppression, then that theme would be of extremely limited analytical value. Finally, there is also a countervailing pressure, in that a theme that comprises too much information derived from conversations may prove incoherent. For example, if interviewees experience cat-calling and hostile questioning, grouping these experiences under the label of 'oppression' may mean that one theme in fact refers to several forms of marginalization. The theme as an analytical unit would then be unable to support any coherent proposals for action.

Thematic analysis is a technique for organising data. Like all research techniques, it is imperfect. In both the coding and the reassembly stage, data is pushed to ever-increasing levels of abstraction. Generalisation is essential to ensuring tractability. It also causes much contextual detail to be lost. One may say that my son is a child, a male, a human, and a mammal. As we move from one level of generality to another, we can group my son with more objects from the natural world. However, there is a corresponding loss of clarity. The state of childhood is a more specific description of my son than the state of being a mammal. I face the same problem when I attempt generalisations from my conversations about socially constructed realities and personal experiences.

How may one moderate reductionism? Here, I adopt two techniques. Firstly, my analysis is not particularly aggressive in its claims to rigour in categorisation. I neither claim statistical causation, nor do I allege that the relationships observed in the data hold in all circumstances. Secondly, the soft-systemic approach is sensitive to divergent worldviews. Contextual diversity can be accounted for at all stages of the analysis. The procedural framework exerts a pressure to embed context in the analysis. This tendency, it is thought, acts as a check on any

reductionist tendencies that may be implicit in the coding and reassembly processes.

Conclusion

Like any piece of research, this work entails methodological choices. The choice of one method over another is a question of epistemological gains and epistemological losses. For this reason, it is important to justify decisions explicitly, so as to enable others to evaluate and, if necessary, critique the study. This chapter discussed three such decisions. The first is to adopt a pluralist, rather than an isolationist approach to methodology. The reason, in brief, is that pluralism allows the co-existence of diverse methodological perspectives, and it asks for a wider range of reflections on boundaries, and boundary analysis is key to systemic intervention, where my work is located. The main reason driving my research is my desire to explore the different meanings the ban has to people which is highly complex. That is why I have ventured into using methods creatively. I have used factual reporting in my Chapter 2 '*Legislative process in Bulgaria and passage of the face-veiling legislation*' – a tool that typifies the quantitative paradigm. The second important methodological choice that I made was to design the mode of inquiry creatively and to align it with systemic intervention.

The last important decision is more technical, in that it concerns the choice of specific methods. I settled on soft systems methodology as a general analytical approach. The reasons are manifold, but paramount is Checkland's focus on the diversity of worldviews that impact problematic situations. Given the close alignment between this analytical device and the concrete problems posed by burqa bans, I believe soft systems methodology offers the best opportunity for a meaningful advance in our understanding of identity and marginalization. I also chose to collate data through semi-structured interviews. Those allow the data to remain tractable while keeping the inquiry context-rich. Lastly, I use thematic analysis to assemble my data into meaningful analytical units. I believe that that technique enables me to gain tractability without compromising on detail.

Through my intervention in knowledge, I need to create a new understanding that will contribute to the know-how (the knowledge) of legislative effects on identity formation. My work does not test the applicability and transferability of previously composed theory: it is a theory building exercise in itself. My investigation concerns the identity changes in Muslim Bulgarians in particular but also aim to answer more general questions about systemic identity formation.

In line with exploratory research, the questions I seek to address in my doctoral thesis are derived from a small corpus of systems and social scientific theory, which will be reviewed in Chapter 6. As these theories inform my research questions, I felt that I needed to set the context - the historical background, the legal aspects and more recent political events that surround the ban before I clarify my choice of research paradigm and methods. It is now time to present the relational theories of identity that have illuminated my understanding of the subject matter. Although there is no agreed universal systemic theory of identity, I am hoping to advance the field with the help of sociology, social psychology and the boundary critique. The derivation of a systems thinking inquiry does not follow a mathematical – pattern of reasoning. There is a marked difference between this approach and that of the natural sciences, and some social sciences such as logistics, marketing and economics, where theory develops through the application of formal logic to axiomatic or quasi-axiomatic premises where hypotheses are tested against data[22].

---

[22] Like all scientific works, this one will also deal with data in the general sense as described in the previous section. The treatment of the data, however, is not analogous to that of the use of data to test hypotheses in confirmatory research: my research hinges upon open questions that seek to unveil the respondent's interpretations of the events that surround them. Moreover, I aspire to humanise my 'data' and to treat the respondents with respect and appreciation; hence, from now on I will refer to the 'data' as conversations and discussions I have had with interesting people. In this regard, my research is the opposite of many standard doctoral projects, where hypotheses are being tested against findings and the sources of these findings are, perhaps unwillingly (or worse still, unknowingly), dehumanised and objectified. I aim to enter the field of my research in the most open and unburdened way possible. By this I do not mean that my research is value free – on the contrary, by accepting that all research is value-laden I will take measures to minimise the

I propose to end with a caveat. Method, on its own, guarantees nothing (Popper, 1959) – whatever procedure is chosen to treat and interpret data, there always remains the risk that pre-existing perspectives and oversights will taint the results. Those risks may only be warded off by the researcher's own circumspection and by ensuring that the research is conducted in an open and transparent manner (Romm, 2001). Throughout this chapter, I oftentimes referred to measures taken to countervail risks that are inherent in the techniques that I use. The adequacy of those measures and the diligence of their implementation are, in the last analysis, a matter for the reader and the reader alone to judge.

---

translation of my values into biases. For instance, my interview questions are open and I have made an effort to abstain from leading questions during my discussions.

Chapter 6 : Relational identity theories: social science and systems thinking

This chapter will introduce the most significant social scientific and systemic theories that investigate matters of identity. The present thesis concerns identity from a systemic point of view. Hence, it is logical to look at relational theories of identity. I commence the chapter by reviewing relational social scientific insights on identity. I start with social identity theory (Tajfel, 1982; Tajfel and Turner, 1985) and, while introducing it, I make an important parallel with identity theory (McCall and Simmons, 1966). Thereafter, I lead the reader through some philosophical cogitations on identity – the debate between individualists (Mead, 1935) and communitarians (Taylor, 1989). Furthermore, I present Sen's (2006) idea of complex identity followed by a section on late modernity – the socio-historical backdrop of the processes I have aimed to investigate. After reviewing ideas from social science, I devote a significant segment to systemic ideas about identity. In this part, I review some systemic theories and delve into the details of the marginalization theory, which is part of the third wave of systems thinking and constitutes an important development in systemic thinking about marginalization processes, power and boundary judgements (Midgley, 1992, 2015). The marginalization theory will serve as the backbone of my theoretical map to be used in the exploration of identity and marginalization in the context of the face-veiling intervention.

Identity in the social sciences

Social identity theory and the role of roles

At the heart of the social scientific quest to understand identity formation and change is the connection between the individual and the collective. The time is opportune to make an important remark about my boundary critique in terms of theoretical choices for this chapter. The aim of this PhD project is to lay down the groundwork for a systemic theory of identity. As my background is in the social

sciences, I endeavour to use social scientific understandings of identity to advance systemic theorising. Perhaps, most notably, psychology has dealt with matters of identity, and while it provides a wealth of resources on how identity has been scrutinized, studied and experimented with, I will abstain from reviewing psychological theories. This theoretical exclusion is due to the focus of psychology (other than social psychology, to be discussed shortly): *individual* emotional, behavioural and overall psychological processes. If identity is relational, then focusing on individuals alone will not be adequate. In contrast, sociology provides interesting ideas about *collective* identity – analysing it in terms of processes, structures, behaviours and rules that operate at a collective level, but it omits the individual level. It seems impossible that individual psychological processes do not play any part at all in emergent social behaviours. As Turner et al (1987) succinctly put it, the social sciences are trapped in a choice between psychology, which is highly individualistic, and sociology, which is impersonal in its social focus. The answer to this forced choice could be social psychology – the study of the relationship between individual and collective psychological processes. As my research involves the marginalization of distinct groups, I will use theoretical insights from social identity theory (Tajfel, 1982; Tajfel and Turner, 1985).

Relational identity theories fit with systems thinking, as they review the interrelationships between identities and put them within the context of a wider system. To clarify this assertion, I will invite the reader to 'get back to the basics' of systems thinking. A system, according to von Bertalanffy (1945), is a set of components that are interrelated for a purpose. These components exist within a boundary, and the system itself is embedded within an environment. The system interacts with its environment through circular feedback loops and the environment is often a wider system. Thus, to look at identity systemically, I will take into consideration interactions between systemic components and the wider environment. This systemic understanding of identity is not new, and in my view, many great minds have been striving to capture this dynamic complexity and the interrelationships between human identity as a system and its environment as a wider social system. These cogitations have been expressed through the self-society nexus (see below).

Particularly relevant here is the work Gregory, a systems thinker who dealt with what she called "self-society dynamics" (Gregory 1993, p.14, 2000, p. 475). Drawing from sociological theories, Gregory (2000) summarises that individual identity is formed through processes of socialisation and individuation. While individuation proponents argue that identity comes from within and is a strictly personal process of self-reflexiveness (Giddens, 1991), communitarians claim that identity emerges from socialisation (Benhabib, 1992). Gregory dismantles this dualism of either individuation or socialisation and integrates these approaches in a model that demonstrates "the interconnections between individual self-creation and societal forces" (Gregory, 2000, p. 484). The individual and the wider society that they are embedded within exist in a relational dance.

It is pertinent to explain what I mean by reflexivity and its derivates – reflexiveness and self-reflexivity. Steier (1995) explains reflexivity morphologically, as coming from the Latin *flex* or *flecto*, which refers to the curved shape of a shepherd's staff, as if the staff is falling back on itself. From this description, Steier (1995) builds the argument that reflexivity encompasses a pattern of being, a relationship, rather than an object: it is reflection on what is happening in relationships, but from a position situated in those relationships. It is also important to stress that reflexivity is tied to context. Thus, reflexivity is "relational-in-a-context" (Steier, 1995, p. 64). Mead (1934) examines reflexivity as the key to identity formation. In his original writings, Mead refers to the process of bending back on the self as reflexiveness:

"Mind arises in the social process only when that process as a whole enters into, or is present in, the experience of any one of the given individuals involved in that process. When this occurs the individual becomes self-conscious and has a mind; he becomes aware of his relations to that process as a whole, and to the other individuals participating in it with him; he becomes aware of that process as modified by the reactions and interactions of the individuals-including himself-who are carrying it on. The evolutionary appearance of mind or intelligence takes place when the whole social process of experience and behaviour is brought within the experience of any one of the separate individuals implicated therein, and when the individual's adjustment to the process is modified and refined by the awareness or consciousness which he thus has of it. It is by means of reflexiveness-the turning-back of the experience of the individual upon himself-that the

> whole social process is thus brought into the experience of the individuals involved in it; it is by such means, which enable the individual to take the attitude of the other toward himself, that the individual is able consciously to adjust himself to that process, and to modify the resultant of that process in any given social act in terms of his adjustment to it. Reflexiveness, then, is the essential condition, within the social process, for the development of mind" (Mead, 1934, p. 134).

He stresses the social nature of humanity, as the formation of the individual is a result of continuous interaction with the social medium. Thus, reflexivity is a self-defining, relational process. It is in a state of constant flux, dependent on the monitoring, reflection and absorption of various forms of information (Giddens, 1991). What I mean in my thesis by 'reflexivity' is the process of "bending back onto a self" (Steier, 1995, p. 63) in terms of interaction between the individual and the social medium. The result of this continuous interaction is the formation of the self (Mead, 1934).

Social identity theory is concerned with the process of assigning the self to various social categories. This self-reflexive process is termed "self-categorization" (Turner et al, 1987, p. 42). The resulting social identity can be defined as knowledge of the belongingness to a particular social category or group (Abrams and Hogg, 1998), while a social group can in turn be viewed as a set of individuals sharing the same social identity. Members of the same social category are presumed to have similar characteristics to the self and are referred to as the *in-group*, whereas persons who differ from the self are the so-called *out-group*. Initially, research into social identity primarily focused on the emotional, evaluative and other psychological aspects of the social comparison process and in-group classification (Turner et al., 1987), and it was only later that a distinction was made between self-categorization, self-esteem and commitment. Self-categorization is the process of the self's reflexive assignment to a social category, while self-esteem is the attribution of value to the self. Finally, commitment to a social group is the measure of the psychological investment of the individual in the group (ibid).

Social identity theory should not be confused with identity theory in social psychology that, instead of group membership, deals with roles (McCall and

Simmons, 1966). The core of an individual's identity in identity theory comprises the various self-assumed categories and roles and their associated meanings and expectations incorporated into the self (Thoits, 1986). These adopted meanings and expectations serve as behavioural norms regulating one's attitudes (Burke and Reitzes 1981; Burke 1991). This classification or naming extends, not only to social roles, but also to all things which are defined in terms of the assumed roles and our plans and activities (McCall and Simmons, 1966), including things necessary to sustain persons and interactions (resources). Resources play a key role in identity processes, as a large proportion of all activities taking place within a role are motivated by a desire to control resources (Burke 1997). The distribution of resources defines social structure and vice-versa. In social psychology's identity theory, all identities are comprised of views of the self which are the result of two processes – self-categorization and identification, where the individual perceives him or herself as a member of a certain social group or the occupant of a specific role. In this sense, although the two theories centre around different bases for self-classification (namely group/category and role), what they share in common is the assumption that individuals identify themselves in terms of meanings attributed by the accepted social structure (McCall and Simmons 1978; Styker 1980; Turner et al. 1987).

There is a clear difference between having a particular social identity and having a role. While a social identity is the state of being a member of a certain group and sharing similar qualities with other members of the same category, a role identity means acting to meet the expectations associated with a certain role and coordinating and managing relationships with role partners (McCall and Simmons, 1966; Burke, 1991, 1997). In social identity theory, when an individual identifies with the needs of a group, they perceive things from the group's perspective. Within a role, the individual can manipulate the environment so as to better control the resources associated with the role.

In summary, while the focus of social identity theory is on the similarities between the perceptions of members of the same group, identity theory deals with the differences between the perceptions of a role as related to its respective counter-role. In terms of my theoretical framework, I have chosen to limit the inclusion of identity theory, despite its magnitude in Social Psychology, for a number of

reasons. Firstly, it is predominantly focused on the self and the individualistic processes and outcomes of roles and behaviours (Hogg et al, 1995). Individuals negotiate optimal roles and outcomes and are driven by rational choice evaluations (ibid). The said relationships between the individual and the role partners are less of a concern to identity theorists; the main focus is the negotiating individual. However, to systemically account for identity, one must look at both the individual and social levels (Gregory, 2000). Therefore, relationships between the individual and her environment, are of prime concern to me as a systems researcher. Secondly, and this argument follows naturally from the first point I have made, identity theory is highly rationalistic, and it follows the logic of *hommo economicus,* who is driven by perfect naïve rationality.

More systemic views on decision making and social processes have already posited that humans are far from the ideal of rationality, and that even when they strive to be, they are constrained by their boundary judgements (Simon, 1948; Ulrich, 1983). Finally, identity theory speaks of roles that are negotiated with other role and counter-role holders. As the negotiation is built upon the notion of reciprocity, exchange and optimal calculations, it is challenging to untangle the complexity of the role negotiation as well as the varying importance each role has to each holder.

Despite the above listed weaknesses of identity theory, I find the idea of roles compelling. For example, if someone is a research student, that is an identity that involves a role – performing research, writing up documents that are overseen by a supervisor. This role, plus the supervisor's role, are regulated by the institution where the student and supervisor belong. Without the student role, the identity could not exist, and without the institutional regulation and the negotiation with the supervisor, the legitimacy of both the role and identity would be lost. Hence, role, identity and the environment (in terms of regulation and other role partners) are closely related. In light of all these arguments, I plan on including the role of roles as postulated in identity theory, but I will not delve into the complexity of role negotiations. While I have excluded some aspects of identity theory, social identity theory as a whole provides a viable avenue to explore relational identity, as there both individual and collective processes are illuminated.

Social identity formation is a composite process involving two distinct mechanisms through which a person shapes their self-concept – self-categorization and social comparison. Both of these cumulative processes lead to different consequences (Abrams and Hogg, 1998), and in essence are the process of actively drawing boundaries (self-categorization) and justifying them with value-judgements (social comparison). Thus, where an individual perceives him or herself to be a member of a certain social category, all similarities between the self and the other members of the *in-group* are correspondingly accentuated, as are any differences between the self and *out-group* members, respectively. This is a direct consequence of the self-categorization process, and it affects all correlates of intergroup categorization, including but not limited to attitudes, beliefs and values perceived to be inherent to the group. In this way a person may alter their affective reactions, styles of speech or adopt different behavioural norms depending on the assumed social identity.

Individuals tend to apply the social comparison process selectively in order to accentuate any properties of their identity which result in enhanced self-esteem consequences (Abrams and Hogg, 1998). They evaluate the in-group relative to the out-group on those dimensions which compare favourably for the in-group or negatively for the out-group. Interestingly, society is structured into different contrasting social categories, and social identification with only one social category makes sense in relation to another opposing category (for example male vs. female) (ibid)[23]. Each category is associated with varying degrees of social prestige and status. Generally, people are born into pre-existing social categories with a predefined position within the social structure. Thus, the social category into which an individual is born precedes and shapes their identity and sense of self. Throughout a person's lifetime, they belong to a large number of social categories which together form a unique combination of social identities and a unique self-

---

[23] This duality has been thoroughly studied by British anthropologist Mary Douglas (1966, 1986), who proposes that institutions are built upon such simple couples as black-white, male-female, sacred-profane. Her ideas will be reviewed later in the chapter, as they have informed Midgley's marginalization theory (1992; Midgley and Pinzon, 2011; Midgley, 2015).

concept. social identity theory is concerned with the correlations between the various groups, and how members of one category (the in-group) view themselves when compared to others (the out-group). This categorization and social comparison results in such social phenomena as ethno-centrism (Turner et al. 1987), among others.

Social identity theorists have discovered that there are several aspects to the group uniformity of perception which may be categorized along cognitive, attitudinal and behavioural lines (Oakes et al, 1994; Abrams and Hogg 1998). One of the main cognitive consequences of group identification is that where stereotyping of in-group and out-group members is more enhanced and pronouncedly homogenous, individuals identify with the in-group more strongly (Haslam et al, 1996). There have also been well-substantiated theories that group identification plays a formative role in terms of the view of the self as prototypical in the group (Hogg and Hardie 1992). The degree of homogeneity of perceptions is higher when there are no motivational factors causing the individual to distance him or herself from other members of the in-group (Brewer 1993). In terms of attitudes, there is a general tendency for people to attribute positive value to a group to which they perceive that they belong, regardless of individual relationships with other members within it (Hogg and Hardie 1992). The more people identify with a group, the more likely they are to act in accordance with the values associated with it. There is also a stronger sense of distinction from out-group members (Ullah 1987; Ethier and Deaux 1994).

One of the core postulates of social identity theory is that people share a tendency to shape their identity through their sense of affiliation with, or membership of, a certain organization or social group based on gender, religious beliefs, age, etc. (Tajfel and Turner, 1985). There are an endless number of categories into which people may potentially assign themselves based on the characteristics they perceive (Turner, 1985), and it is through the assignation process and identification of others outside the relevant categories that an individual orders his or her social environment into perspicuous segments. People within his or her social realm are systematically attributed the prototypical characteristics of the group to which they are assigned, unreliable as such stereotyping may be

(Hamilton, 1981). In addition, social classification serves as a means to identify oneself and find one's respective place within the social structure.

However, social identification is not a simple matter of binary classification into opposing groups, as the sense of belongingness may vary depending on the degree with which a person identifies with a certain group. For instance, two people with the same nationality may not perceive themselves as members of said social group in the same way or even to the same degree. People may assign positive or negative value to certain aspects of their social identity and become vested in or distanced from the fate of the group. As the concept of social identification appears to have been derived from the earlier construct of group identification (Tolman, 1943), the two terms can be used interchangeably. Past research has suggested that identification is a perceived cognitive construct which is not necessarily linked to any behaviour or affective state; i.e. an individual who identifies as a member of a certain group may not, in fact, act on achieving the group's goals. For instance, a Muslim woman who lives in a village where women do not cover their hair may go against the norm and decide to put on a headscarf.

Identification and internalisation

A clear distinction must be made between social identification and internalisation (Hogg and Turner, 1987) (for more details see also Kelman, 1961; O'Reilly and Chatman, 1986), since identification refers to assigning certain social categories to the self, whereas internalisation refers to embracing the values and attitudes of a social group and incorporating them into one's belief system to the extent that they motivate one's behaviour. An individual may categorise him or herself as a member of a group and yet disagree with some of the associated values and attitudes prevailing in said group. In that case, acceptance of a social identity is not synonymous with value acceptance or internalisation. Furthermore, inasmuch as social identity is formed on the basis of identification with or opposition against a social referent, it is similar to identification with a person; for instance, a father figure, or a relationship role (e.g. teacher-student).

It must be noted, however, that identification with a person, also known as "classical identification", stems from one's desire to appeal to, imitate or gain the qualities and characteristics of another person (e.g. Bandura and Walters, 1963; Kets de Vries and Miller, 1984). In contrast, in the case of social identification, the individual does not attempt to "be like or actually to be the other person" (Kelman, 1961, p.63), but rather to define the self within the same social context. These two types of self-identification coexist and complement one another. The sense of identification with the needs of an organization, for example, may be enhanced where there is a strong desire to identify with its charismatic leader.

Self and others: philosophy and economics

Interestingly, the dynamics between individual identity interacting with collective identity is the theme of a heated debate in the social sciences today, as identity-motivated violence seems pervasive. Many social scientists and policy-makers are striving to untangle these dynamics, in order to understand what those in the mainstream of Western societies view as extremism, and to design appropriate responses to it (Sen, 2006; Parekh, 2008, 2009; Kundani, 2015).

Many philosophers have looked into identity and the processes that constitute it. Put succinctly, there are two dimensions of identity: personal and collective. These two dimensions of identity and how they relate to each other have inspired much philosophical cogitation. Mead (1934) delves into the relationship between collective and individual in identity formation. He draws a line between two dimensions of the self – the 'I' and the 'me'. 'Me' is the socialised self – it incorporates behavioural patterns of others. I is the personal, unsocialised self. The "I" is an amalgamation of emotions, desires and thoughts. The sense of the social self is fashioned through interactions with other selves. Language offers building blocks in the constitution of the self.

Human beings communicate through symbols, which represent objects in our own minds and in the minds of others. Self-awareness arises when the person is able to distinguish between the two. In short, if the personal *I* can be separated from the social *me*, then there is a realisation of the demands of society and culture. Mead

(1935) believes it is possible for the *I* - the individual subjective self – to transcend the *me*. However, it has been argued that Mead's (1934) model is too rationalistic, concerned with the cognitive and conscious – it does not deal with emotion (Elliott, 2013). There is no recognition of tensions between the individual and collective dimensions of identity –tensions between desires and the norms of social behaviour. In this sense, the 'I' transcending the 'me' is too simplistic. However, it maps out the subtleties of self-formation through the interactions between self and others in day-to-day routines.

Charles Taylor (1989) also muses at the human 'software' but, in contrast with Mead (1934), Taylor (1989) does not suggest that a separation between levels of self is possible. He provides a more coherent account of the self by proposing that there is an individually unique self, still very much influenced by social conventions and values. Taylor proposes that our ability to make moral judgements dictates our identity. Morality is what defines us, and it is related to us through frameworks. Mead, too, asserts that the self is formed through the reflexive process between the individual and the social. While Mead (1934) believes that the 'I' can transcend the social self, the 'me', and abandon the social frameworks that have crystallised the 'I', Taylor deems this impossible. The frameworks that feed into us moral ideas are inescapable. These frameworks circulate throughout our social medium and revolve around ideas of the good (what Taylor calls morality). Identity is defined by individual priorities. In other words, what matters to the individual defines her as the person she is. Those priorities, however, are shaped in the social niche where the individual functions, and this is the central assumption in Taylor's philosophy: the individual with her preferences and moral lodestars emerges from the social sphere.

Identity is articulated through the language of interpretation, as it is the only tool available. Hence, to understand the self, one needs to delve into self-understanding and self-interpretation. The identity of the individual relies on their *interpretation* of "the good" (Taylor, 1989, p 3). This is formed by the moral compass – what the agent deems acceptable or unacceptable – sacred or profane. The self is on a continuous journey towards what is perceived as the good life. The self therefore emerges from its social context with the help of orienting moral frameworks. These frameworks are sometimes so implicit, having been

internalised through socialisation processes that the individual is barely aware of, that agents interpret them as "'gut feelings'" (Taylor 1989, p 7). These feelings nevertheless have traceable geneses in socially-circulating conceptual frameworks that the individual has accepted as axiomatic (ibid). These frameworks dictate morality that unfolds in three separate axes:

> "In general, one might try to single out three axes of what can be called, in the most general sense, moral thinking. As well as the two just mentioned – our sense of respect for and obligations to others, and our understandings of what makes a full life – there is also the range of notions concerned with dignity. By this I mean the characteristics by which we think of ourselves as commanding (or failing to command) the respect of those around us".

> (Taylor, 1989, p 15).

These are different axes of "the good" (Taylor, 1989, p 3) which serve to orient the self, as identity is only formed in relation to morality. The first axis encompasses beliefs about the value of human life in general. It is built on the respect for human life and, essentially, the moral obligations of living in a collective with others. The obligations and respect deemed to others are emerging from the social. These moral obligations are codified into laws (such as various human rights laws) and social expectations, and according to Taylor, some sort of appreciation for the value of human life exists in every culture. This is logical, since societies run on some sort of collective effort at co-existence.

The second moral axis refers to beliefs about the kind of life that is worth living and what goals should be achieved. These are the beliefs informing choices in everyday life; also, the aspirations towards the life deemed as deserved by the individual.

The third axis relates to the dignity granted to the self and to others based on how social roles are understood. Dignity is defined as the ability or inability to gain respect from others, while respect is being valued, rather than merely not infringed upon, as is the case with respecting someone's rights. In short, this axis relates to the feeling of usefulness and to the social value of the individual. Moreover, the second and third moral axes touch upon the relative place of the individual with regards to the collective – a theme that will be reoccurring throughout my work.

Institutional thinking

Taylor (1989) advances the idea that societies function using ethical and moral frameworks, and so does British social anthropologist Douglas (1966, 1970, 1986). Moral frameworks affect our judgements and actions – they bind our rationality in a covert way (Simon, 1948). The collective instils values in the individual that are transmitted through frameworks that are inescapable (Taylor, 1989). It would be naïve to assert that these moral frameworks are inescapable in their entirety on every occasion. Examples of overcoming collective values that one has agreed upon are numerous: for example, when violent gang members convert to a new religion and stop their violence (Midgley, 2020).

Sometimes these frameworks are formally incorporated in institutions. An in-depth analysis of policy that affects identity requires a good grasp of institutional theory. Douglas's (1966, 1970, 1986) insights on institutional thinking inform my inquiry into Bulgarian policy. As a social anthropologist, she focuses on institutional systems and the relationships between individuals, collectives and institutions. Her institutional theory is built upon symbolic analogies that come in couples to inform thinking – such as male-female; speculative philosophy-applied science, left-right (Douglas, 1986). Perhaps the most exciting and fundamental pair is sacred-profane (Douglas, 1966). The sacred and profane are opposing moral poles, understood as equivalents of purity and danger. The sacred here does not connote the supernatural, but embodies order, safety and purity. Profanity is evil, destructive and polluting. Because of its contaminating nature, its existence is a threat to the sacred.

The profane is the state of disorder, as everything has its place in the universe and humans devise institutions and rules to organise all elements of the social system. Douglas's (1966) ideas inspire my thinking of the binding properties of the sacred-profane pair, visible in individual sense-making, but also in institutional design. While order is sacred, dirt is matter out of place: may it be an act, a relationship or an object. To mediate the harmful effects of the profane and to prevent its dangerous unwanted interaction with the sacred, societies have generated rituals to purify, protect and redeem (Douglas, 1966).

To maintain purity is to protect the sacred from unwanted interactions (Douglas, 1966). Institutions fence themselves off from predatory individuals and vice-versa; individuals protect themselves from predatory institutions by attempting to change the institutional arrangements (Douglas, 1986). The defence mechanisms are various and also ruled by institutions. For instance, an individual may protect herself from a predatory institution through protests (legal or illegal) and other forms of public exposure in the media; she can utilise whatever tools are available to her that resonate with her ethics. Similarly, an institution can protect itself through the security apparatus, the judicial system and through administrative systems.

In my Bulgarian case-vignette, a woman who wears a face-veil supposedly sees it as something normal and orderly (sacred). However, by legislating against it, the Bulgarian State reframes it as profane (disorderly). This reframing is justified by values that the State has expressed in the supporting documentation attached to the ban, as well as in public media debates. It is hence interesting to study a situation where a practice or behaviour is seen as normal by one group and abnormal by another. Even more importantly, in the Bulgarian case, the disagreement is between citizens and the State – there is a grave power imbalance in the ability of these parties to negotiate the official framing and institutionalisation of the sacred and the profane.

Moving away now from the specifics of Bulgaria, and returning to Douglas's general theory, what the institution guards itself against tells a lot about what the system acknowledges as valuable and sacred (e.g. some countries penalise animal cruelty, as the lives and well-being of animals is sacred). Similarly, the measures of protection are informed by the values upheld by the system (some countries still carry out capital punishment; and both verdicts and sentences for crimes vary, depending on the local legal context). Hence, the act of purification and the nature of this act signifies the values upheld by the system in place (Douglas, 1966). Recall from the legal chapter of the thesis that wearing a face-veil is an administrative violation punishable by fines. It is also framed as a disturbance of the public order.

In this sense, paying the fine is an act of purification because wearing a face-veil is contaminating the sacredness of the public realm, where face-veils embody

oppression, fear of the unknown and dread of foreign cultural influences (Bill No 654-01-58, 2016). Finally, the institutions that carry out this defence reflect the values upheld by the system. However, on many occasions, these values do not represent the diverse palette of moral ideas upheld by the human agents that comprise a social system. This seems like the old question of individual and social reframed anew: whether or not the collective moral frameworks bind individual morale in a tight grip, which remains to be answered in my analysis. If moral frameworks become institutionalised through legislation, then the question whether or not they are embraced and/or transcended remains burning. While looking at the way people respond to the law and the values it openly proclaims as sacred (meaning normal and desired – Douglas, 1966), one could not but wonder at the "self-society dynamics" (Gregory 1993, p. 14, 2000, p. 475).

Such cogitations involve the preference of individuals between competing moral frameworks, as well as those institutionalised by law. What comes in focus is the individual agency and ability to make these choices. In Western capitalist societies choosing between competing moral frameworks is normalised, which may not be the case in traditional societies (Midgley, 2019a). On this occasion, I am reviewing processes of marginalization and identity in a post-Communist system that is in its ;ate stages of transiting into a capitalist society, so I believe that such bold individualistic statements are well-grounded.

Interestingly, the independence of the personal 'I' from the socialised 'me' also informs the work of Sen (2006). In his view, however, identity is highly complex, and although it is formed by a multitude of group memberships and social categories, he argues that everyone can potentially transcend this multiplicity of detailed distinctions and focus on larger social categories, such as man, woman, human being. The pertinent question is how to differentiate between the two levels – social and individual. Whether such distinctions are in any way useful is perhaps less clear. On either side of this debate are Sen (2006, 2009) and Parekh (2008, 2009). Both seem invested in the issues of individual and collective identity, especially with regard to identity-motivated violence. Their views on how to achieve balance and peaceful coexistence in heterogeneous social contexts are, nonetheless, contrasting. Parekh proposes the notion of 'overall identity' – it holds the inseparability of the two main identity categories that every human being has:

individual and social. Individual identity is the unique 'selfhood'. It is the wishing well of many action-guiding emotions, such as fear, shame, love, guilt, anger, etc. It is the black box for past and future self-narratives. Social identities are more or less roles the individual plays. In this respect, Parekh's (2009) cogitations chime with identity theory in Social Psychology, whose weaknesses were reviewed earlier.

Sen (2009) critiques this notion as dangerous. Personal identity differs from social identity; and what is more, it can transcend social identity to avoid conflict between the ethical frameworks upheld by different social identities. Sen envisions a formula for conflict prevention, once personal identity is distanced from and social identities and roles. Once social identity overrides personal identity, the rich complexity becomes reduced to one social identity. Then the variety of the self is lost to the simplicity of the overall identity (Sen, 2009). Sen himself does not have a clear vision of what individual identity consists of. Instead, he chooses to describe it as a multi-faceted bundle of relationships and social identities. Nevertheless, there is a separate unique 'self' there, which has the ability to draw distinctions, create and destroy narratives and change. This individual identity has the agency to expand its web of social identities (at least in Western, pluralist societies) – and it has a free will. Destiny as a pre-written, culturally determined path is a mere illusion, fed to the individual through the web of social identities it has accepted (ibid).

In Sen's view, the self is capable in making choices between competing moral frameworks, moreover, the self could choose a larger, universal social identity that reconciles conflicts in moral frameworks attached to other identities and roles. In his words:

> "... a Hutu labourer from Kigali may be pressured to see himself only as a Hutu and incited to kill Tutsis and yet, he is not only a Hutu, but also a Kigalian, a Rwandan, an African, a labourer and a human being. Along with the recognition of the plurality of our identities and their diverse implications, there is a critically important need to see the role of *choice* in determining the cogency and relevance of particular identities which are inescapably diverse." Sen (2006, p.4)

Such explanations of identity processes are plausible in a pluralist society and perhaps less transferrable to an 'untouched' tribal society. The idea of choice between social and role identities rests upon two main assumptions: first, the existence of competing social identities and the moral frameworks attached to them, and second, and the empowerment to make these choices.

Late modernity and identity

The time is now opportune to make a contextual remark in terms of zeitgeist. To perform a study of identity changes and marginalization situated in twenty-first century Europe, I believe I should consider the notion of late modernity (Giddens, 1990; 1991). Giddens (1991) uses the phrase 'late modernity' to signify the 'radicalised' phase of modernity. Unlike some other modernity theorists, he does not believe that we live in a post-modern society just yet. Humanity, Giddens (1990; 1991) argues, is near the end of the modern era; post-modernity is anticipated and will surely commence, but it is not the dominant paradigm yet. Giddens provides an insightful analysis of self-formation in the contemporary, ever-globalising context[24]. In late modern times, the individual is confronted with a multitude of choices and interpretations, a multiplicity of moral frameworks. Hence, the institutional order is highly ambivalent. Risk is amplified by globalisation and by the media, and individuals perceive information through various outlets and may become involved with events that are not geographically and socially immediate. The contemporary person lives in an interconnected world, ridden with global crisis. Moreover, the contemporary person is self-reflective. Identity is thus established through individual choices and actions, thoughts, feelings, desires and interpretations of experiences relative to social norms. Identity and social

---

[24] The magnitude of globalisation, technological innovation and mass communications on identity is comprehensively covered by Giddens (1991) in *Modernity and Self-Identity.* There, he reconceptualises security, danger, risk and trust with regards to self-identity processes nested within the modern way of life.

structure are inter-connected and are in a continuous dance, but the personal experience is existentially prime.

It is important to note one particular aspect of modernity: globalisation exacerbates tensions between identities and lifestyles (Grillo, 1991). Agents who come from various backgrounds and places may struggle to form social relationships, because their 'medium' is not the traditionally shared one, due to geographical differences in race and ethnicity. The community in the immediately post-world war period had a more or less fixed geography, language and culture (Giddens, 1991, Young, 2007). The late modern community lacks those fixed boundaries. In pre-modern times, social networks were anchored in geographical areas with very little space for mobility (Giddens, 1991). The race, creed, lifestyle and ethical system was more or less the same throughout the span of an individual's life. By contrast, late modernity is dynamic and fluid. The fluidity is not literal – many communities are geographically fixed for generations – but new developments in telecommunications allow exposure to fresh ideas and shorten the distances between people and places (Elliot, 2013). There is a plurality of choice and a plurality of lifestyles – as well as rising mobility opportunities. This pluralism, however, is a double-edged sword. On the one hand, it creates opportunities for cultural exchange, but on the other, pluralism demands a choice between different options. This process of separation between the desired and non-desired, between the right and the wrong, between the pertinent and non-pertinent, or even more strikingly, between us and them, can result in marginalization.

Pluralism entails the recognition and acceptance of divergent views of "the good". The sacred and the profane rise in bounded communities (Douglas, 1966). Modernity poses a challenge to the ways in which individuals and institutions think, as boundaries multiply with the movement of people and values. The variety of lifestyles and value frameworks demands a clarification of what kind of life is worth pursuing and a determination of the relative position one has in a society (Taylor, 1989). This process of separation between the right and the wrong, between the pertinent and non-pertinent, between who we are and who we are not, in systemic terms, is *conflict* when two opposed groups each have the strategic means to maintain their status while they (often fruitlessly) try to undermine the

other (Midgley, 2016), and it is *marginalization* when one group's perspective is made dominant over another, so (from the point of view of the first group) the second can legitimately be derogated and treated as profane (Midgley, 1992, 2015). While Midgley's (2016) theory of conflict is interesting and useful, it is marginalization that is most relevant to my thesis (as will become clear when it comes to my data analysis), so this is where I will turn to next.

Marginalization theory and identity in systems thinking

Marginalization in systems thinking and social science

The processes of making distinctions and drawing boundaries informs Midgley's theory of marginalization, which offers unique insights into relational identity processes. Marginality evokes connotations with centrality. The obvious analogy is a sheet of paper – the margins exist in relation to the main body of the text and vice-versa (Midgley, 1992). It is relational, as margins can only be defined by the existence of a centre. According to the Oxford Dictionary of Geography, marginalization is:

> "The process by which individuals and groups are prevented from fully participating in society. Marginalized populations can experience barriers to accessing meaningful employment, adequate housing, education, recreation, clean water, health services, and other social determinants of health. Both community and individual health are deeply affected by marginalization."

> (Mayhew, 2015, unpaginated)

As this definition suggests, the marginalization lexeme is often associated with poverty and social exclusion. Poverty is a set of vulnerabilities, impinging on access to social goods such as education, health services, the market, political representation and so forth (Hulme et al, 2001). The confusion between marginalization and poverty stems from the phrase 'social exclusion', as marginalization is often used as a synonym for this (Sen, 2000). For a phenomenon to be marginal or subsidiary, there must be a cynosure. All poverty theories suppose some sort of similar discontinuity between haves and have-nots that may be studied and intervened upon (Laderchi et al, 2003).

The logic of the social exclusion approach to poverty is as follows: if a part of the population receives privileges, then clearly that happens at the detriment of another social segment - that of the 'marginalized' (Sen, 2003). Social exclusion is a synonym for poverty, which encompasses the multifaceted character of poverty as a set of vulnerabilities, rather than mere financial difficulty. In line with this definition are the concepts, current in the nineties, of social exclusion and social inclusion. As per Duffy, on behalf of the Council of Europe, social exclusion is the inability of individuals and groups to participate in social, economic, cultural and political life (Duffy, 1995). The popularisation of the term 'social exclusion' is synchronous with the publication of Sen's capability approach to poverty (Sen, 1993)[25].

There are significant differences between marginalization and social exclusion in systems thinking. Poverty and social exclusion may indeed be emergent properties of marginalization, from the viewpoint of the marginalized, but only when marginalization is seen in the context of social opportunities. In fact, marginalization is a higher level process of separating the apposite from the in-apposite. Hence it is important to acknowledge the broad and versatile character of marginalization as a boundary-laying process. This requires refusing to insist, as some sociologists do (E.g. Kabeer, 2000; Sen 2000, 2001; Gallie et al, 2003), on using marginalization as a synonym for social exclusion.

Sen's (2000) contemplation upon the mechanisms of marginalization, albeit narrowly anchored in social exclusion, inspire an inquiry into the mechanisms of marginalization as a whole. According to the capability approach to poverty, wellbeing is the capability to realise human potential (Sen 1993). He argues that social exclusion can be constitutively a part of capability deprivation as well as

---

[25] Sen's capability approach presents wellbeing as the capability to realise human potential and hence, poverty is a set of incapabilities and inhibited freedoms (Sen 1993, 2000). The capability approach targets *individuals*. As the present study is concerned with the systemic dynamics between individual and collective, I will omit the capability approach.

instrumentally a cause of capability failures (Sen, 2000).For example, a poor Bulgarian woman from the Roma community is expected to live a shorter, less healthy life and would have less access to education and the labour market, compared to white Bulgarian women (NSI, 2011).

Roma people live in ghettos, in poor housing, many of which have been illegally erected. Since this woman was born, her capability to access the market would have been hampered by her relative place in society. Poor education, or a total lack of it, would be preventing her from entering steady employment, and many Roma women work either in the grey economy or in very low-skilled jobs, such as hygienists. Political parties and the media often make a spectacle of the Roma lifestyle and stress the criminal lives some Romas lead (O'Higgins and Ivanov, 2006). Because most Romas are indeed in these positions, employers are less likely to hire a Roma worker, whether they are skilled or not. The unemployment leads to higher criminal activity and thus the cycle of unemployment and crime is reinforced. Similarly, poor education and early motherhood exist in such a vicious cycle and reinforce each other. In a capitalist democratic society, poor education and early motherhood are functions of social exclusion [in Sen's (2000) terms]. Hence, social exclusion resulting in poor education is both a part of and a cause of capability failures.

Marginalization theory

As mentioned above, marginalization entails a separation between centre and periphery. In other words, it is a process of drawing boundaries around elements of a system, to determine its centre. Therefore, as Midgley (1992) cogently notes, the use of boundary critique provides an interesting lens to examine marginalization processes. Recall from Chapter 5 that boundary critique concerns the relationship between value judgements and judgements on truth (particularly what is taken as relevant) (Ulrich, 1983). It follows that drawing boundaries to define the parameters of a problem is an essential step in its analysis. With regards to marginalization as separation between dangerous and safe elements, the sacred and the profane are the main poles that inform boundary construction in marginalization processes.
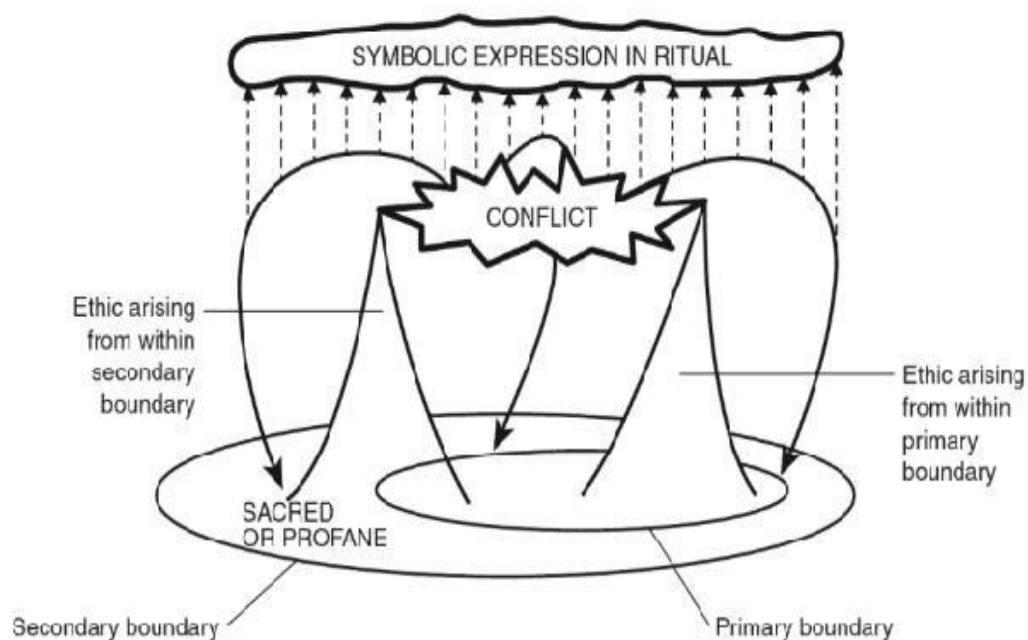
Figure 6.1. Margins, ethics, sacredness, profanity and ritual (Midgley, 2015, p. 159)

The model is as follows: there are two boundaries – a primary and a secondary one. Beyond the secondary boundary are all elements that are not pertinent to the system; they are excluded from the analysis of it (Figure 6.1). The elements within the primary and the secondary boundaries are linked with different ethical, moral or value systems that result in conflict. This conflict is in turn expressed in ritual. Marginal elements have strong values-based attributions made about them – they are either viewed as sacred or profane, depending on whether they are being viewed with the primary or secondary boundary (and associated values) in mind. Then the rituals actually make one of these attributions dominant over the other. Midgley defines ritual as "behaviour, in whatever context, that contains certain stereotypical elements that involve the symbolic expression of wider social concerns" (Midgley, 1992, p.11). However, imagery, although not presented in the original papers about marginalization theory, has an equally important role (Midgley, 2019a). In terms of the focus of my research, wearing a Muslim veil is a

behaviour that, from one perspective, is functional because it shields women from being seen as sex objects. However, it is also symbolic, so it is also a ritual behaviour. Interestingly though, from the perspective of non-Muslim Bulgarians, or simply not face-veil wearing Bulgarians, it could also be seen as a powerful image with a variety of connotations.

Marginalization theory has been applied in various contexts to further the understanding of marginalization processes. Midgley (1992) and Midgley et al (1998) transplant the sacred and profane to contemporary social contexts as a useful lens for looking at social policy to tackle marginalization – such as unemployment policy (Midgley, 1992), housing services (Midgley et al, 1998), services for children living on the streets (Boyd et al, 2004), IT planning (Córdoba and Midgley, 2003, 2006), and practitioner identity in Māori community development (Midgley et al, 2007). Midgley's theory of marginalization (Midgley, 1992; Midgley et al, 1998) sheds light on how situations involving people who make different value and boundary judgements can result in ethical conflict.

Sen conceptualises two different types of social exclusion (marginalization): active and passive. Exclusion is active when it is purposefully pursued, and it is passive when it happens unintentionally. In systems terms, however, exclusion from the system means invisibility or non-existence. Or at least, existence without any implications for the system in question (Midgley, 1992).

The elements within the secondary boundary, however, are not invisible in the situations that Midgley and colleagues describe – they are framed as profane by those using the primary boundary, or sacred by those using the secondary boundary, and their existence is often made a spectacle for the occupants of the central part of the social system. I would like to remind the reader that the meaning of 'sacred' here is orderly, normal and safe, while profane is everything that upsets this order. It is precisely through the profane representation of the marginal elements that the 'central' ones feel more sacred, or at least normal, in comparison (Midgley, 2017). As marginalization is relative, if the marginalized are represented as sacred, some have argued, the central players become relatively deprived (Young, 2007).

To advance this understanding in the context of the systemic process of marginalization, as a distinction between centre and periphery, one may argue that marginalization is complex. Marginalization is a reason for a process, a process in itself, and also an output which in turn generates a process. For example, low ranked schools usually tend to be in disadvantaged areas (Lupton, 2004). Schools in disadvantage areas have both material poverty issues as inadequate furnishing and equipment and low attainment. Thus, low-ranked schools usually are underfunded by the Government. Having graduated from these schools, pupils are less equipped in continuing their education or in securing an apprenticeship, thus often end up in lower-paid jobs, being able to afford cheaper housing which in turn is situated in capture areas for low-ranked schools. Thus, generations of deprived area residents remain in roughly the same income and education bracket (Hirsch, 2007).

There is often mutual stereotyping between the people advocating the primary versus the secondary boundary (although usually ones comes off worse than the other in a situation of marginalization), and it will be interesting to explore the social identifiers used as anchors for this stereotyping, with the help of social identity theory. Recall that its supporters believe that the self-concept is made of a personal and a social identity, comprised of idiosyncratic characteristics and salient group classifications, respectively. According to this definition, social identification is seen as the perception of belonging or unity with a group of individuals based on characteristics such as nationality (sharing the same ethnic background with others) or gender (being of the same sex as others).

The individual strongly identifies with the needs and achievements of the group to which he or she belongs, to the extent that this social identification becomes an integral part of their self-concept, or self-identity (Stryker and Serpe, 1982). However, self-definition is only possible in relation to and in comparison, with the definition of others (Tajfel and Turner, 1985), where one category is defined in opposition to another (e.g. being young as compared with being old).

Midgley (2015) proposes that the observation of ritual helps one to identify where sacredness and profanity might lie, and therefore where marginalization might be causing ethical conflicts (ibid). Indeed, seeing any part of the system of rituals,

sacredness, profanity, value conflict, narrower/wider boundary judgements and marginalization could trigger investigation of whether the rest of the systemic process is present. Moreover, an observation of social ritual may indicate which interpretations of the sacred and the profane are dominant, and which are suppressed. Still, it would be fascinating to delve into individual perspectives on centre and periphery with regards to relational identity. For instance, in the case-vignette of Bulgaria, from the perspective of policymakers, face-veiling as a practice is viewed as profane. The attributions of sacredness (from veil-wearers) and profanity (from policymakers) come into conflict.

Ethical dominance transpires through the ban against the face-veil. Individual perspectives on the ban, especially Muslim perspectives, could be included in the analysis of marginalization processes. To do this, I have commenced my quest backwards, starting with the observation of the ban and inquiring about perspectives on the elements within the system, and these perspectives come from my respondents.

Figure 6.2. A schematic sketch of Midgley's marginalization model (Midgley, 2000, 2015).

When A sees itself as sacred, then it views B as profane. Conversely, if B views A as profane, it sees itself as sacred, or perhaps normal. The elements within the primary boundary often assume a sacred status due to power dynamics. For instance, the 1 per cent in the States is a small minority, seen as profane by some of the majority (the 99 per cent movement). However small, this percentage of the population does influence politics and has a good stake in determining the

regulation of the system. Hence, the one per cent and its ethics dominate the system and inhabit the system's centre. Despite their profane status in the eyes of some of the system's marginal players, the sacred status of the top 1% is dominating the profane attribution of social activists (Midgley, 2019a). Moreover, this is reinforced by numerous rituals: luxury goods consumption, investment rituals, philanthropic rituals etc.

Thus, marginalization can sometimes be beneficial for the marginalized, so long as their sacredness is made dominant (ibid). This if course, is the case, when the elements between the primary and secondary boundaries have the power to influence interpretations of their status. On the occasion when they do not, then marginalization could play a negative role – when they are less able to influence their sacred status or to negotiate the ruling of the system in line with their concerns. The ethics of the margins can still become reflected in the system's regulation, however with less ease. To conclude, both A and B may have a sacred/profane status depending on the perspective being taken. However, a characteristic of marginalization is that there is no common agreement on who is sacred or profane. A will always champion its sacredness or normality and B's profanity, and vice-versa. Social identity theory can illuminate some of the stereotyping against out-group members, as identity is formed based on the distinction between the categories that the self accepts it belongs or does not belong to (what the self *is and is not).*

Identity in systems thinking

Various systems thinkers have discussed identity, but a systemic theory dedicated *solely* to identity is yet to be championed. Often, matters of identity are discussed without discussion of what identity is (Morgan, 2005; Katz, 2009; Stokes, 2009). Systems thinkers either apply ready insights from sociology, philosophy or psychology (for instance, Stokes, 2009, relies on Spencer-Brown, 1969, and Burke, 1991; and Katz, 2009, relies on psychoanalysts like Sibley, 1995, who studies the juxtaposition and mutual formation between self and other). Systems thinkers also very commonly use the work of the evolutionary biologists, Maturana and Varela

(1979), whose work has inspired cogitations on organisational identity in Beer (1979) and social systems identity in Luhmann (1986) and Stokes (2009).

Despite the lack of a dedicated theory of identity, the literature on systems thinking holds interesting ideas on the matter. Beer, for instance speaks of organisational identity, and maintaining this identity is the responsibility of system 5 in his viable system model (Beer, 1972). System 5 corresponds with the brain in the human being and is responsible for managing present and future activities and overseeing the interactions between all the other systems. System 5 balances the demands from all the aspects of the organisation, and it represents the organisational identity, which is defined by the scope of actions and depth of environmental complexity the organisation can manage (ibid).

For example, a school is defined by its ability to admit and educate pupils. To Beer (1985, p. 807), identity is intimately linked with viability – a system that exists and can be perceived as having a "recognizable identity". He equates organisational identity with human identity as both a human being and a firm have an identity if they can be recognized as separate and distinct from their environment. Such organisational insights on identity are valuable for management systems scientists, but they offer limited prospects for individual identity research.

Many systems thinkers like Beer (1979), Luhman (1986), and Stokes (2009) have been influenced by the Santiago School of Cognition (Varela et al, 1974;Maturana, 1981; Maturana and Varela, 1987;). The Santiago School of Cognition draws a distinction between the *structure* and *organisation* of living systems or organisms. Structure relates to the processes of construction of an organism; it refers to the components of the system in question. For example, in the biological sense of a human body, its structure is created in an ongoing manner through biological self-renewal and interactions with its environment; its organization, on the other hand, is about the fundamental identity of the organism, which guides biological self-renewal and interaction. The organization of an organism is essential to it, while the structure may change according to what the organism interacts with and learns from. The organization of a cat prevents it from becoming a frog, but its structure may change in interaction with its environment, so it becomes a scared cat, a

pregnant cat, an ill cat or a contented cat. It's 'catness' remains unchanged throughout its life (Saussure, 1972, p.26).

Every living being is a living system with distinguishable boundaries, much like any system (von Beralanffy, 1945; Varela et al, 1974;). Every system produces itself in congruence with its environment, and this constitutes the process of living (Varela et al, 1974; Maturana and Varela, 1980). As per the original Santiago School taxonomy, the living system is a 'unity'. Any given unity is the network of interactions between the components of a living system and the structure they embody.

> "We maintain that there are systems that are defined as unities as networks of productions of components that (1) recursively, through their interactions, generate and realize the network that produces them; and (2) constitute, in the space in which they exist, the boundaries of this network as components that participate in the realization of the network. Such systems we have called autopoietic systems, and the organization that defines them as unities in the space of their components, the autopoietic organization. We also maintain that an autopoietic system in physical space (i.e., an autopoietic system whose components we define as physical, such as molecules) is a living system, and, therefore, that a living system is an autopoietic system in physical space." (Maturana, 1981, p. 21)

All unities exist because their constitutive elements (cells) are structurally coupled. First-order structural coupling happens between the cells of the unity. There unity and its niche co-exist in a continuous interaction which is called second-order structural coupling[26]. The unity couples with its niche, hence it performs a second-

---

[26] Interestingly, the language of orders has been present in cybernetics for a long while. First-order cybernetics is the art of observing systems; second-order cybernetics is the act of observing oneself observe systems (von Foerster, 1976; 1991).

order coupling (as the elements within the unity couple in a first-order manner – Maturana and Varela, 1987). Third-order structural coupling is between two or more autopoietic unities in a social context. Autopoietic systems are, in essence, amalgamations of processes that self-produce themselves in a recursive manner (Maturana and Varela, 1980). The unity adapts to its environment and vice-versa through structural coupling: the exchange of information between the system and the medium, which allows the unity to continue its autopoietic process. There are constraints to the structural coupling that a unity can engage in before its autopoiesis is disrupted – the system may even perish.

Initially conceptualised to explain strictly biological processes, autopoiesis has inspired some developments in social system theory (Luhmann, 1986). Maturana (1980) argues that human beings as living systems are autopoietic unities, and social groups like families, clubs, etc., are examples of mediums where unities perform their autopoietic cycles and interact in the domain of language.

The time is now opportune to make an important remark. The contributions of the Santiago School of Cognition to social systems have sparked a lot of debates between the School themselves and the wider scholastic community who aimed at developing and applying their insights. Autopoiesis, structural coupling, structure and organisation are biological processes, but they have been used to metaphorically explain social processes, to the great displeasure of the theory's creators (e.g. Maturana, 1980, rejects the whole notion of social autopoiesis). Varela (1981) likewise warns against the metaphoric use of autopoiesis and its application to organisations, as they do not produce themselves, but manage operations and relationships.

In light of the metaphor of autopoiesis debate, Maturana and Varela (1987) offer their own cybernetic contribution to social systems: they emerge from the biological autopoiesis of peoplepr, animals and plants as well as the communication between all the creatures who share their autopoietic journey. As for humans, every human act happens within language, which is a system of shared meanings (notwithstanding individual idiosyncrasies of interpretation) that brings forth a co-created world (Maturana and Varela, 1987). Maturana's later work is mainly concerned with communication and language (Maturana et al, 1995;

Maturana and Verden-Zöller, 2008), and he himself does not engage with theorising *social* identity in terms of structure and organisation. Hence, although seemingly exciting, autopoiesis does not offer a very fruitful avenue for systemic identity research, except in view of communication patterns, which, albeit interesting, is not the focus of my thesis. Still, it is valuable to mention that, according to the Santiago School, all human acts happen within the domain of language, and that reality is socially co-constructed through language.

 This insight is congruent with Taylor's (1989) view that reality is created in the social domain and that individual identities emerge from the social, with a specific moral referent – the good. Recall that, to Taylor (1989), our identities stem from our ability to make value judgements and draw boundaries in relation to the good. His theory, however, does not account for the place to which we render others in relation to the good. Douglas (1966) observes that individuals and societies spend a great deal of time and effort to protect the good (the sacred) from the bad (the profane). Midgley's marginalization theory (1992) deals with this too – the relative place to which we render ourselves and others, in relation to these basic moral categories. It is the only systemic theory that deals with evaluation of self and others in terms of values and morals and, as such, it is the bedrock of my own theoretical exercise.

Conclusion:

My work, which constitutes an intervention into a domain of knowledge (as discussed by Midgley and Ochoa-Arias, 2001), aims at an understanding of systemic aspects of identity formation and marginalization. This chapter has reviewed the theoretical insights on identity formation and marginalization that I intend to use. These insights will provide inputs into my analysis and will guide my understanding of relational identity processes. In this chapter, I also introduced the distinctiveness of my chosen theories. For instance, there is the distinction between social identity theory and identity theory – the former is concerned with individual and social group dynamics, while the later with control over resources and negotiation of optimal situations.

Additionally, I clarified my understanding of marginalization - in the development and social policy literatures, the term 'marginalization' is often used as a synonym for social exclusion. However, in systems thinking (where I am rooting my own research), the marginalized are not excluded from the view of the system - they exist as part of the system, but as peripheral elements.

It is the process of marginalization in relation to identity referents that I am concentrating on in my thesis, and I hope that the reader will commence the analytical parts of this work well-equipped with the theories I will lean upon, before I get to my own systemic identity theory-building exercise. My research is in the systemic intervention paradigm and it benefits from methodological and theoretical pluralism. As far as theoretical pluralism in general (as opposed to in my own research) is concerned, it may or may not call for an integration of the multiple theories used, depending on the purpose of the research (Midgley, 2011). The theories I laid down in the present chapter have served to guide my analysis, and because my purpose is to generate new theoretical insights into identity, integration becomes essential. Their integration into a new synthesised theory of systemic identity will be presented after the following Chapter 7 *'Intervention in knowledge'*.

Chapter 7 : Knowledge intervention: analysis of Muslim perspectives on the face-veiling legislation in Bulgaria

This chapter contains the analytical segment of my thesis. Thus, the following lines present my attempt to describe and analyse the discussions I have had during my data collection in Bulgaria. I have also included my personal experiences as interviewing people, recruiting participants and interacting with them was a learning process in itself. My data collection was an adventurous one, not without challenges, and I have learned a lot about the facilitation and recruitment of respondents. Similarly, analysing the interviews was also a wonderful learning opportunity for me as I applied SSM in a novel way, and the application illuminated key factors in marginalization and identity formation processes.

This chapter is structured as follows: it will commence with notes on my data gathering and methodological applications. Since I adapted SSM in the course of my analysis through multiple iterations, I have included the methodological development in this first section. After the parameters of my respondents and methodological choices are set, I will move on to the actual analysis of my discussions. I will present two main perspectives on the face-veiling ban, each of which contains two sub-perspectives. The relationship between them will be exemplified by a model. Finally, I will summarise the key insights of my analysis in the conclusion.

Ethical procedures and data management

Throughout my research instrument design and data collection phase, I have followed the ethical guidance provided by the University of Hull. Before commencing my ethics application, I read the University Code of Practice and the Faculty Ethics Procedures. I ensured the protection of personal data according to the GDPR rules through anonymising procedures, as explained below.

As part of my ethical approval application, I included several appendices: an information sheet, consent form and invitation to participants, a research travel plan, and a research tool (a list of questions that were informing my semi-structured discussions).

Consent form

Respondents were provided with a consent form. The form contained the title of my research, a brief description of the project, their approval for being recorded and details about the withdrawal process as well as the contact details of my supervisor and myself. Respondents were provided with my contact details so that they could at a later stage of the research, they can have the opportunity to discover how their inputs have fed into my analysis. All consent forms are kept in a locked cabinet.

Because I was planning to engage marginalized communities, I took measures to ensure that personal data was protected, with participants still having the ability to contact me regarding the output of my work. It was important for me to give people the right to comment on the conversations they had with me. Thus, I shared my email address and the email address of my supervisor, in case participants wanted to get in touch and allow me to 'close the loop', after my research had concluded. As some of the people I spoke with were not IT literate, I also shared my Bulgarian mobile phone number, which I keep active. I would like to add that, to this date, I haven't been contacted by any of my participants.

Discussing sensitive issues

Before commencing my research trip, I consulted with my supervisors and planned for my engagement with research participants. I expected that some of the discussions would be challenging and difficult, as the face-veil is a contentious issue in Bulgaria. Thus, I was prepared to listen empathetically to my respondents without judging their position on the face-veil and its ban. Discussing contentious issues can be challenging. The researcher, like the respondent, may have their own political, religious and ethical beliefs. As mentioned earlier, I have worked with refugees and asylum seekers in the past, so part of my training consisted of listening skills and non-violent communication. I planned to put these skills into

practice, once I enter the field. It is also worth noting that I was planning to interview some people who have a different cultural background than mine, such as Muslim Roma women. I come from a mixed Muslim/Christian family, so interviewing across religious boundaries was not an issue. Because of my understanding of the Muslim faith I do not anticipate sensitivities arising. I also considered the need for a chaperone when interviewing Muslim men in mosques, and a friend of mine had agreed to take this role when required.

Data strorage

As I recorded the conversations, I initially kept the recordings in a locked cabinet in Bulgaria and later on in a locked cabinet in the United Kingdom. At the time of data collection, I kept a participant log so I can ensure every participant was given logged in and that personal data was anonymised. The audio recordings of the conversations were destroyed after transcription, as specified in the consent form. The transcripts are now kept in a password protected digital folder. I applied to retain my data for up to seven years after being awarded my degree. The seven-year period is made up of two years of possible post-viva amendments and five years while writing papers from the PhD project.

Other ethical issues

 In its Code of Good Research Practice, the University of Hull (2015, p.32) acknowledges that "[r]esearch inherently has risk associated with it". Hence, I also completed a risk assessment that included a summary of the research project, my contact details and the contact details of my supervisors. My research trip was not considered risky (or Category 2, as per the forms), as I was planning to travel to my country of origin, which is an EU member state with a stable political and social environment.

My personal travel plan contained details of the research trips inside Bulgaria I was hoping to make. The travel plan is a good way for the supervisor to 'keep an eye' on the student's welfare and safety, especially when travelling abroad. I kept in touch with my supervisors during my research trips, and they supported me throughout the challenges and successes I was facing (I return to these experiences in more detail below).

At the time of applying for ethical approval, I felt that it may be possible to come across the issue of compensating my research participants for their travel expenses and their time. I thought that, since some of my interviewees would be from deprived backgrounds, interviewing such vulnerable people would entail a specific approach that may be different from the approach I would use to interview other people, who were more affluent and established in society. When interviewing economically vulnerable people who come from deprived enclaves, I suggested that they may have required a reimbursement for the time they spent talking with me. I believed that there could have been some issues arising from this: some participants might have changed their statements according to what they thought I wanted to hear as a response. Additionally, if I was compensating them for their time, this could have created a sense of financial superiority of the researcher and inferiority of the participant.

The British Sociological Association Statement of Ethical Practice (2017) dictates that sociologists often engage in research with people less or more powerful than the researchers themselves. Because sociologists often study the relatively powerless, research relationships can sometimes be characterised by disparities of power and status. Despite this, research relationships should always be built upon trust and integrity. Hence, I said that it may be necessary for me as a researcher to not only cover travel expenses of research participants, but also sometimes compensate them for the hour(s) they spent talking with me, using the standard minimum wage of Bulgaria.

When it came to my actual data collection though, the people I recruited did not ask to be recompensed. This meant that my conflicting thoughts on the issue were resolved. This was a valuable lesson for me as, in practice, research interventions do not take the exact route that one plans for. On the other hand, it was useful that I considered the matter of compensation, as this allowed me to enter my fieldwork prepared for such a scenario. If I had entered the field without being granted ethical approval for reimbursing my participants' time and travel expenses, it could have potentially affected my participant recruitment and engagement.

Notes on data collection and analysis

I had discussions with people from all the main Muslim groups in Bulgaria: Pomak, Roma, Turkish, Arab as well as converts to Islam and Gagauz people. Upon engaging people in my research, I encountered some difficulties. To be perfectly candid, initially I had issues in respondent recruitment and retention (my first respondents opted out of the study a few days after their interviews).

To do my data collection, I travelled to Bulgaria and, before my departure, I had already made contact with some (to be more precise seven) civil society organisations, some of whom seemed open to helping me recruit participants. However, as soon as I arrived and asked for a meeting, I did not receive a response. To this day, none of these NGOs has responded to my attempts to contact them. This did not discourage me, and I approached a few other Muslim NGOs and mosques, but they were reluctant to participate in my research. Two weeks into my research trip, all of my contacts had gone cold, and I was failing to recruit research participants – I was beginning to feel lost. The Muslim side of my family kept offering to be interviewed, which was making matters worse because it was hard to explain to them that this would be methodologically unacceptable due to their personal relationships with me, and therefore the possibility that they may simply say what they thought I wanted to hear. I urgently needed participants who were independent from me, and who, ideally, were representatives of different Muslim minorities.

I was driven by the assumption that Muslim civil society and spiritual organisations may be interested in my project, as it studies the reactions to the face-veil, which I assumed was a topic every Muslim person, and by extension, organization, has a stake in. Initially, people were open and friendly, as I would start off by presenting myself as a PhD researcher who is keen on exploring the politics and governance of Muslims, and I explained that I am also married to a Muslim. I believe that this aspect of my personal life – my marriage – did help me gain the initial trust of some of my respondents. However, when it came to Islamic organisations, their staff were reluctant to assist me. As soon as people heard that I am hoping to interview Muslims with regards to the face-veiling ban, the doors

were metaphorically slammed in my face. I was becoming desperate to recruit participants.

One day, I simply approached a woman in a mosque. I explained who I was and what my research is about. She was moved by the topic I had chosen to explore, and we met the following day for my first interview. I learned my first valuable lesson: not to rely on mediators, but to access my respondents directly, whenever possible. Before I left the UK to collect data, my supervisors advised me to ask every participant whether they knew someone who had a different view on things. I did ask this question of most of my participants. I later learned that this technique is a modified form of snowballing. Classic snowballing entails a respondent-driven recruitment, where one respondent leads you to other(s) (Snijders et al. 2003). This technique for participant recruitment was originally proposed by Coleman (1958) and Goodman (1961) as a way of researching social networks. Snowball sampling is an established method for studying groups who are hard to reach (Biernacki and Waldorf, 1981). Bulgarian Muslims are relatively secluded within their own ethnic circles, so snowballing seemed suitable.

However, this method is not without its problems. There is the peril of accessing self-contained systems when using snowballing, and thus getting very similar responses from all respondents (Saunders, 1979). Also, it has been established that, in snowballing exercises, people who act as gatekeepers of the group under investigation may have a range of selection biases, including avoidance of people who hold conflicting views (Arcury, & Quandt, 1999). Thus, gatekeepers often introduce the researcher to others from their own social networks, who have similar worldviews. Dick (1999) suggests a solution to this problem: asking the participants to recruit others who have a *different* view to themselves.

Following this strategy, I have managed to avoid some biasing, although the absolute avoidance of bias is not possible, simply because one form of 'bias' (that should really be viewed more positively as 'purpose') is the asking of questions by the interviewer, which guides the interviewee down a partially pre-determined path. This said, similar responses within a social network still occurred. Indeed, sometimes participants would lead me to others who held different views, and

sometimes they would introduce me to respondents who held similar views to them, even though I asked them not to do this.

This experience chimes with the postulates of social identity theory: members of a social identity group usually share a degree of similarity in terms of moral attitudes. In any case, snowballing seems to be the only reasonable way to access marginalized populations and ethnic minorities, if you are coming into them from outside, so Dick's (1999) version of it was the technique I adopted.

As soon as I overcame the hurdle of getting initial access to those hard-to-reach populations, the ball started rolling, and a couple of months later I had conducted 35 discussions on the subject matter of the face-veiling ban.

Another issues I encountered involved participant withdrawal from the project. Three Pomak people (two ladies and a gentleman) who I interviewed near a Sofia mosque called me a day after our discussion and asked me to delete their recordings.

A couple of people requested not to be recorded but did not mind me keeping notes of the conversation. One of them, a naturalized Algerian, did not want to officially give his input on Bulgarian politics, as he was not born Bulgarian: he said that this was a Bulgarian issue, and it was not his place to comment. The other two were women who wore the face-veil. They were friends from the same neighbourhood. Their reasons were fear of the police. I believe they influenced each other in not being recorded, and also, they influenced the three Pomak respondents who all requested to have their records deleted. This is one of the issues with snowballing – as I dove into the social network, it collectively tackled me! Thankfully, all of the people I met agreed on me keeping the notes from the conversation, as long as I had removed all personal identifiers.

I acknowledge that the ethnic complexity of Bulgarian Muslims may not be a familiar topic to all readers. The table below illustrates the interviews I organised during my research trip. I hope this can aid the reader's orientation in relation to the dataset and my analysis.

Participant number	Community	Gender	Age	Perspective
1.	Turkish	Male	67	Securitist
2.	Turkish	Female	61	Securitist
3.	Pomak	Female	25	Paternalist
4.	Pomak	Male	60	Securitist/Paternalist
5.	Arab	Male	55	Securitist
6.	Arab	Female	50	Securitist
7.	Turkish	Female	27	Paternalist
8.	Turkish	Female	22	Paternalist
9.	Turkish	Female	26	Paternalist
10.	Roma	Male	39	Humanist
11.	Turkish	Male	37	Anti-securitist
12.	Roma	Male	62	Humanist
13.	Roma	Male	47	Paternalist
14.	Turkish	Female	46	Humanist
15.	Arab-Bulgarian	Female	36	Anti-securitist
16.	Turkish	Female	34	Humanist
17.	Turkish	Female	60	Securitist/Paternalist
18.	Bulgarian (convert)	Male	58	Humanist

19.	Pomak	Female	23	Humanist
20.	Pomak	Male	45	Humanist
21.	Gagauz	Male	60	Anti-securitist
22.	Bulgarian (convert)	Female	70	Humanist
23.	Roma	Female	42	Humanist
24.	Roma	Male	24	Humanist
25.	Roma	Male	50	Anti-securitist/Humanist
26.	Roma	Female	34	Humanist
27.	Turkish	Female	55	Humanist
28.	Turkish	Female	32	Anti-securitist
29.	Gagauz	Female	33	Anti-securitist
30.	Roma	Male	79	Humanist
31.	Turkish	Male	34	Securitist
32.	Arab-Bulgarian	Female	28	Securitist
33.	Arab	Male	23	Anti-securitist
34.	Turkish-Roma	Male	58	Humanist/ Anti-securitist
35.	Turkish	Male	36	Anti-securitist

Figure 7.1 List of research participants

Intervention in knowledge

In reviewing attitudes towards the face-veiling legislation, one should not omit the notion of perspective. The face-veiling ban is a phenomenon (in the sense that it is a human construct – see Kant, 1781) and serves as a moral referent – people place themselves and categorise others in relation to the ban. The divergence of perspectives is key to interventions in knowledge, and my PhD constitutes one. An intervention always involves a shift in knowledge and understanding. That is because, even when interventions affect reality, all that we have to go by to know that the change has happened is data mediated by interpretation (Midgley and Ochoa-Arias, 2001). As Midgley and Ochoa-Arias (2001, p. 618) succinctly put it:

> "The unfolding of the sense of a phenomenon means exploring the limits of different perspectives on it—perspectives which can be conceived as complex judgments and styles of reasoning about the world. It implies that knowledge is not a matter of choice among different perspectives. Instead, it is a critical search *for* different perspectives that can enrich consciousness about the phenomenon."

It has been argued that identity is shaped through processes of socialization and critical reflexivity (Gregory, 2000). Both these processes happen in relation to moral referents – the good (Taylor, 1989) or the sacred and the profane (Douglas, 1966). The face-veiling ban is a phenomenon that, contingent on the perspective, is evaluated differently.

However, the ban is also a moral referent – whether it is seen as sacred or profane will determine the way people relate to it and, hence, the way they relate to the Muslim women who are affected by the ban. Identity is determined by everything it *is* and everything *it is not*. Traditionally, sociological identity theories rely on distinctions that are value-laden (such as sacred and profane – Douglas, 1966). Identity theories have been critiqued by Gregory (2000) for the duality of the identity-establishing processes: on socialization and individuation (as discussed in the previous chapter, Gregory, 2000, contests the separation between these processes, as individual cognition is inextricable from wider systemic processes). Hence, indeed, a scrutiny of perspectives on the ban could illuminate identity and marginalization processes.

Housekeeping notes on method

To advance my understanding of distinctions in the context of the face-veiling ban, I collated my interview transcripts following the BATWOVE mnemonic (Midgley and Reynolds, 2001). Recall that BATWOVE stands for *beneficiary, actor, transformation, worldview, owner, victim* and *environmental constraints.* Midgley and Reynolds (2001, 2004) innovated Checkland's CATWOE (Checkland, 1981; Checkland and Scholes, 1990) by introducing an additional stakeholder – the victim. Midgley and Reynold's (2001) innovation brings balance to Checkland's (1981) CATWOE, where the customer is the centre of all things, while a transformation is not simply prompted by owners and executed by actors to benefit commercial customers: it could also be harming stakeholders, hence the language of victims.

Additionally, the classic 'customer' is replaced with a 'beneficiary' to indicate that the transformation does not necessarily imply a transactional commercial relationship (Midgley and Reynolds, 2001).

This innovation of SSM was applied by Midgley and Reynolds (2001) in a workshop with the purpose of crystallising agendas for action. The project aimed at improving environmental planning and involved workshops with a variety of participants – expert environmental planners, activists and governmental representatives who were all representing different concerns and perspectives. The BATWOVE, like its predecessor, CATWOE (Checkland, 1981), serves to harmonise understandings and perspectives (Midgley et al, 2005).

Remember, from Chapter Five that, in soft systems methodology, CATWOE is part of the third step – deriving root definitions of relevant systems. As such, it serves to bring together different perspectives on the system at hand that will help design future actions for change. Similarly, the BATWOVE from Midgley and Reynolds (2001) also serves to bring different perspectives together, in order to derive agendas for future action. Thus, SSM is indeed a valuable approach to communicating ideas of stakeholders who hold different perspectives.

In tune with Systemic Intervention (Midgley, 2000, 2006, 2011, 2015, 2018; Boyd et al, 2004), I am creatively using the BATWOVE, while my aim is not to

build the mutual understanding of different stakeholders, but to analyse them through my intervention. Through my analysis, I aim to create new knowledge that would improve the mutual understanding of different perspectives. As such, I do not seek to create an accommodation between different perspectives, although such an intervention could be contemplated as part of my future research agenda. For reasons of clarity, I am presenting the original BATWOVE layout, as utilized by Midgley and Reynolds (2001):

"Beneficiaries:	'Immediate' and 'ultimate' beneficiaries of the proposed transformation;
Actors:	Those who should make the transformation happen—the people involved in making the system work;
Transformation:	The purpose of the system—what input is changed into what output?
World-view:	The perspective (including values) from which the transformation looks meaningful and desirable;
Owners:	Those who have the power to stop the transformation happening (to stop the system from working);
Victims:	Those affected in a negative way (in their own terms) by the transformation; and
Environmental constraints:	Those factors that have to be taken as given in designing a system."

Midgley and Reynolds (2001, p. 15).

Steps towards systemic reflections

I have conducted 35 semi-structured interviews with Bulgarian Muslims. The interviews were recorded in Bulgarian, and afterwards they were transcribed in Bulgarian and translated into English. Every translated transcript was subjected to a BATWOVE analysis in the form of a grid. I created tables in Microsoft Word with seven rows and three columns. The first column contained a mnemonic letter from the BATWOVE, such as B (beneficiary); the second column contained keywords and my own interpretation of the respondent's view on beneficiaries; while the third column contained direct quotations, I had copied and pasted from my translated interview transcripts. After organizing all the transcripts into BATWOVEs, I clustered similar perspectives together by placing the transcripts

into themed piles. The following grid is an example of a respondent who holds a statist perspective (see later in this chapter for what I mean by 'pro-ban'):

Participant 2 Turkish 61	My notes	Quotation	Notes
B	The institutions of the state	we have to respect the institutions of the state. For schools, what can I say... schools are secular, so...	
A			
T	From veiled to unveiled / allowed to be banned	For me, the ban is normal.	
W	Everyone should respect the laws of the country and the dress codes prescribed.	Personally, I would never wear one. I have always dressed in a coquettish, European way. Even now, I go to get my hair done once a month. I do not think I could wear a headscarf. Nor would my daughter. I find it a bit strange that people who spent their entire lives dressing in a different way, suddenly they start doing it. But if they want to, they can, at least at home, for sure. On the other hand, I see on TV that in some cities it has been banned. I find it very hard to pick a side, but if you are not allowed to wear shorts to	

		court, then you cannot wear a burqa, either. For me, the ban is normal – we have to respect the institutions of the state. For schools, what can I say... schools are secular, so...
		It is hard for me to say. I would probably accept a girl who wears a headscarf if she is very religious, but not a burqa. It is best to keep schools religion-free, because schools are separate from religion. They are different institutions. I think education should be secular. Of course, different religious communities can have their own provision for religious education. There are Sunday schools. There are Christian religious schools and there are Muslim ones. That is a different thing. But normal schools are secular institutions. A school is not a good place for burqas. I think religion and faith help, man. I think that if a person was brought up in a religious tradition... to fear God, to respect God, then that person can only get better... I grew up at a time when there was a serious loss of interest in religion. Nobody brought me up religiously. Maybe those who are religious are happier. That is what I think. Faith helps.
O	The State	
V		

E	Bulgarian social space does not traditionally host burqas.	I remember that they were constantly showing us gypsies from Pazardzhik, who had suddenly decided to wear burqas. Their husbands had thick beards. It is difficult for me to speak on the subject. I did not take any specific interest in it, but that... ethnicity, they are very easy to enlist into all kinds of religious communities. Some become evangelists, others become fervent Muslims. Personally, I think they were promised privileges to induce them to wear burqas. I do not identify with them. They decided to do that, they can do it. I am neither ashamed *of* them nor *because* of them. They are their own people. I have my own environment...Come to think of it... I think we have a different attitude to life. They are very keen on their traditions. They like their families, they are a bit freer, there is more responsibility among us. To parents. To children. We are not people who give up everything just to be merry. Song and dance without thinking of the future. I think they are more carefree than us, and the Bulgarians, too. Well, I think that they live in poverty. The vast majority of them do. It is clear to me that these groups are vulnerable. They attract preachers of all creeds. And I think that... if someone was offered some aid, or some acquisition, I think they might have become members of the religious community because of that. Without thinking too much. Just like they used to be Christians with Bulgarian names. If I recall correctly, one of the main	

| | | actors was on trial, he used to be an evangelist before he became Muslim. I think it was like that.

I think it is a bit strange. Back in the day, only very old women would wear the headscarf. Now, more and more do it, but I do not think it is that popular in Bulgaria.

Oh yes, I have seen it on television. I see that many Muslims do it. I have been to Turkey a few times. I see that they do it more and more, but I do not see many people in a full burqa. I would never wear one, personally. My daughter is a young woman, she doesn't wear one, either. My mother also never wore it. | |
|---|---|---|---|

Figure 7.2. BATWOVE grid.

As mentioned earlier, some of the interviews were not recorded, or the recordings were deleted at the request of the interviewees. In those instances, I organized my notes (rather than direct transcripts) in a BATWOVE to best of my abilities, as evident in Figure 7.1.

It is important to introduce a crucial caveat to my analysis: I have applied the BATWOVE retrospectively. This means that, upon data collection, I was not aware that it would serve to structure my analysis. Hence, I did not seek to fill all of its dimensions during my interviews – for example, in some conversations, environmental constraints or even actors and owners were not covered (including in the example above). I do not deem these omissions to be a weakness, as the very fact that interviewees omitted key aspects of the BATWOVE could itself provide insights on identity and marginalization, as such gaps could illuminate significant lacunae in people's thinking.

My BATWOVE ordering

In tune with the creative design of methods (Midgley, 1989a, 1990, 1997a, 1997b, 2000; Midgley, Nicholson and Brennan, 2017), which is an aspect of Systemic Intervention (Midgley, 2000), I have not followed the BATWOVE as originally described by Midgley and Reynolds (2001). They suggest that the analysis follows the order TWBAOVE, starting with the transformation and the worldview that justifies it. The T acts a bit like a heading. By putting it first, the participants in a workshop (the context in which Midgley and Reynolds used BATWOVE) can agree what they are talking about, and then the W helps them begin to deepen their understanding. Instead, I resorted to another order, which emerged organically from my analytical process: T (transformation), W (worldview), E (environment), B (beneficiaries), V (victims), O (owners), A (actors). I commenced with T: the framing of the transformation itself for the same reason that Midgley and Reynolds did (it acts like a heading). After reviewing the way, a participant defined the transformation, I sought the justification of it (W). Placing the worldview right after the transformation was key to understanding stakeholder perspectives (up to this point, I used a similar logic to Midgley and Reynolds, 2001, except not in the context of workshops). Midgley and Ochoa-Arias (2001, p.618) assert that:

> "Developing and exploring perspectives involves a search for the deep grounds from which the rationale of each perspective stems, revealing how it conceives, and explains, the phenomenon. The discourse through which the different perspectives are developed needs to highlight the differences between them to show the contingent nature of the ways in which they are bounded. It should enhance the possibility for a debate among the different perspectives regarding the phenomenon under study. In this sense, it unfolds the power of the dominant conception as relative and empowers marginalized discourses by highlighting their relevance concerning a given phenomenon."

The ban prohibits certain behaviours. Hence, placing oneself in relation to the ban can be very telling of an individual framing of the sacred and the profane (Douglas,

1966; Midgley, 1992) and 'the good' (Taylor, 1989). Additionally, the justification of this framing delves deep into the rationale that upholds each perspective.

Reflecting on the BATWOVE, one can actually see that values can be found in the framing of any component, not just the W, as Midgley and Reynolds (2001) suggest – who the victims and the beneficiaries are, for instance, is highly dependent on respondents' values and beliefs. Nevertheless, one could assume that the worldview component reflects the core values that bind the phenomenon, its framings, and the various values expressed or implied in the B, A, O, V and E components. Indeed, that is why (following Midgley and Reynolds, 2001) I have chosen to place the worldview after the transformation.

However, during my analysis, I discovered that core justifications can be found in respondents' views on environmental limits as well. As I was processing my transcripts, environmental constraints were appearing at the very beginning of the face-veil legislation discussions. Initially, I did not expect to find much about environmental reflections in my analysis. However, after just a few BATWOVE analyses, I became amazed at how crucial people's assumptions about what counts as the environment actually are (as opposed to things that can be influenced). In section 'E' of each grid, I have included socio-political, geographical and even climate-related limits and conditions that my respondents talked about. These limits were informing the statements made by my respondents, as they kept returning to them throughout their interviews. Things identified as environmental constraints included established social rituals, temperatures (i.e., the heat of the summer, which people might respond to by dressing in certain ways), and established social rituals (such as having an open face when being in society so as to be recognizable).

Hence, I did not keep the original position of environmental constraints, although it is the traditional manner of 'wrapping up' any CATWOE/BATWOVE to end on it. While some of my respondents did not mention owners, beneficiaries, victims or even actors, all of them made explicit references to socio-political and ecological conditions when justifying their worldviews. This makes sense in terms of the complex relationship between the individual and their environment, discussed, for example, in the works of Douglas (1966), Taylor (1989) and Gregory (2000). In

the original SSM (Checkland, 1981; Checkland and Scholes, 1990), and in its variation by Midgley and Reynolds (2001, 2004), 'environmental constraints' refer to any general limits to creating or changing a system (such as time, resource and budget constraints, manpower, legal and economic factors). However, while pondering on the lexeme 'constraint', one could not avoid the association with boundaries and the values that inform their construction (e.g., as discussed by Churchman, 1970; Ulrich, 1983; Midgley et al, 1998; and Midgley and Pinzón, 2011).

Most respondents reflected on the environment as a broad socio-cultural framework, including the collective ideas of right and wrong that may or may not be reflected in legislation, while only one of them thought of the limited resources to purchase the veil, making it a rare and expensive item. Mostly, the environment was referred to as a collective ethical code: ways of being, the cultural state of affairs, as well as responses to the climate conditions (e.g., Bulgarian summers are hot, and a face-veil would be impractical).

Hence, following the logic of my respondents, I have placed the environment after the worldview. Thus, my initial grid starts with TWE and is followed by BVOA – the stakeholders involved in or affected by the transformation. While in Midgley and Reynolds (2001, 2004), their respondents viewed the victims as mostly non-human –the planet, for instance – in my application the victims and all the stakeholders were human agents. I have not only reshuffled the sequence to TWE BVOA, but have also clustered transformation with worldview and environment, followed by a group of the main stakeholders. This ordering and coupling transpired during my analytical process, as links between the components were becoming more and more evident. For instance, I discovered that the transformation, worldview and environment explain how each one of them is framed, so the TWE cluster emerged. Notice in Figure 7.1 that Participant 2 evaluation of the ban is contained in the W – 'worldview' section. The *justification* of this evaluation, however, is in the wider environmental constraints – her opinion of the Roma who are face-veiling as well as the traditional Muslim style of dress she is used to are all in the environmental reflections.

Additionally, by bringing the BVO together, I could identify the key stakeholders of the transformation – the immediate beneficiaries and victims, as well as the owner who has control over the process. While actors are important stakeholders, in this instance they were mostly executive and judiciary players in the State apparatus who apply the law. So, in a sense, they are often not independent from the owner, which was invariably the State. Hence, Actors follows the State in my BATWOVE. I believe that it is important to reflect on the framing of all the stakeholders (especially the beneficiaries, victims and owners) because, through these contrasting roles, much can transpire in terms of boundary judgements and sacred-profane framings (Midgley, 2015).

While processing the transcripts, I noticed the emergence of a few roughly homogenous perspectives. Logically, and perhaps in a binary way, people would either defend the ban, or argue against it. In the following section, I present the two main perspectives, which I call pro-ban (in favour of the ban) and anti-ban – (against it), and I go through the TWE BVAO steps in building my justification.

The following Figure 7.2 is visualizing the two different perspectives that emerged. The black arrow represents the intervention that assigns marginal status to the women who wear a face-veil. The intervention is moving the practice of wearing a veil from the sacred sphere of permitted behaviour to the profane sphere of forbidden behaviour. It is also reasonable to assume that this marginal status is extended to their wider families, provided family members live together and approve of the face-veil. After this cemented marginalization, different actors interpret it as profane or sacred. Pro-bans, who have the dominant perspective (upheld by the State), marginalize the face-veiled women, while anti-bans attempt to marginalize the pro-bans in response. It is namely the dynamics of the conflicting interpretations and the perspectives arising from them that I aim to investigate in the following paragraphs.
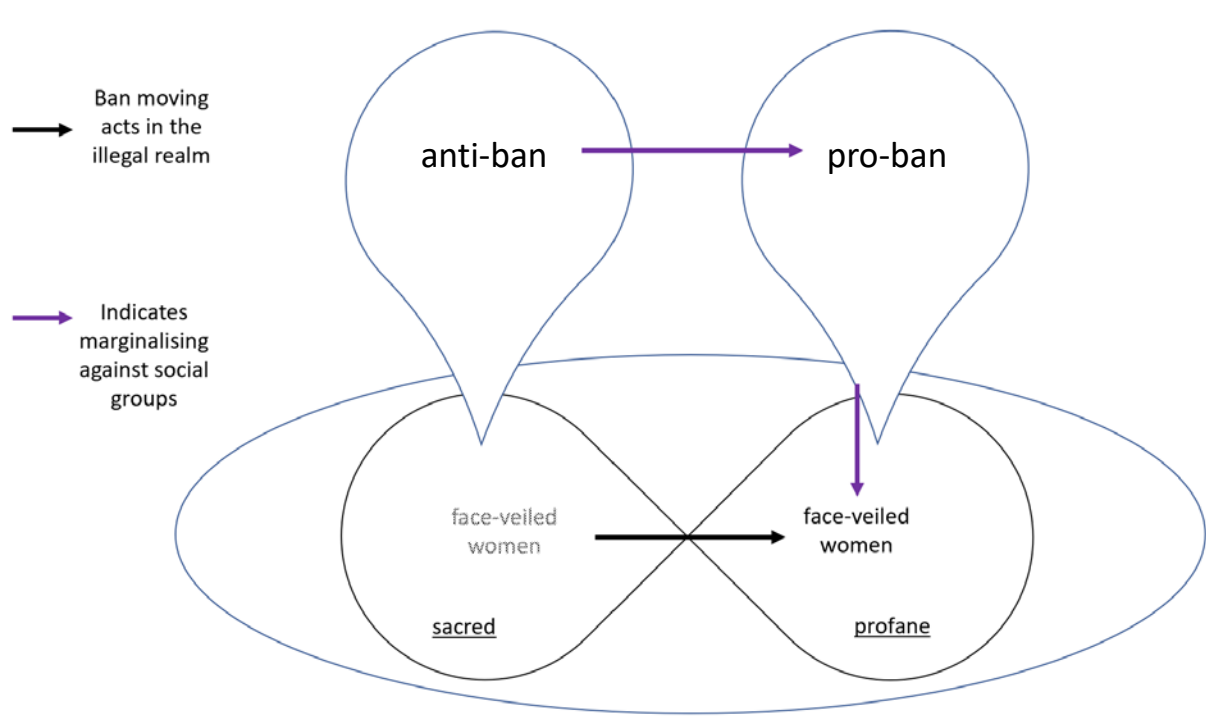
Figure 7.3. Perspectives on the face-veiling legislation in Bulgaria.

Analysis

Pro-bans: securitists and paternalists

Thirteen of my respondents defended the existence of the ban. Here I will provide an overview, at this stage unsupported by quotations – the quotations will come when I go into more depth later. I have labelled the group 'pro-bans', as their justification for supporting the ban mirrored the official reasons the government listed in the motives document, attached to the bill introducing the ban (Bill 654-01-58/20.04.2016). Chapter Three reviewed these, but to remind the reader, the main reasons were cultural non-compliance, the prevention of foreign cultural intervention, transparency in terms of security, and women's rights. The ban under the pro-ban perspective provides protection against violent extremism as well as liberating the ones who would otherwise wear the veil. Victimhood was

largely omitted from this perspective, while the range of beneficiaries was wide: covering the whole of Bulgarian society and sometimes extending to the whole of Europe.

The pro-ban worldview underpinned their reasons for supporting the ban, which were clustered around two main themes: national security and women's rights. I have labelled the group focusing on the former, 'securitists'; and those looking at women's rights, 'paternalists'. Both national security and women's rights were underpinned by what the respondents saw as an imperative for cultural compliance. I decided to separate the pro-ban perspective into these two distinct intellectual currents (focused on security or on women's emancipation) because the majority of my pro-ban respondents talked about only one rather than the other. Only four of the pro-bans were equally concerned with both topics, and hence their ideas are presented as examples of both securitists and paternalists.

The securitists

Eight of my respondents felt that face-veiling poses a threat to the security of the State, so I labelled them 'securitists'. The time is right to introduce a caveat – this thesis does not concern the novel philosophical study of securitism as a new form of actualism in consequentialist cogitations (as discussed by Portmore, 2011). Actualism is the belief that phenomena can either exist or not and hence, existence is a robust state of actual being (Menzel, 1990). It is juxtaposed with possibilism, where existence is less robust: possibilism allows for a state of being, an existence, that *could* have been. For example, the question, do aliens exist?, would be answered very differently by the two philosophical camps. To actualists, existence can only be actual, and since we have no proof of actual aliens, the answer is negative. Possibilists, on the other hand, propose that there could indeed be aliens, even though we have no evidence for their existence, because, alongside actual beings like us, there are also *possible* beings, like aliens (Menzel, 1990). For more details on philosophical securitism and moral securitism, please consult Portmore (2011) and his critics, Timmerman (2015) and Vessel (2016).

I have borrowed the term 'securitism' from international politics and peace studies. I have a keen interest in peace research, and completed a master's degree in peace, conflict and security before taking a two-year Research Associate position, where I studied sectarianism in the Middle East. Securitism in international relations is a way of framing an issue. The term was introduced by Fidler (2007a, 2007b), referring to the belief that packaging an issue as a security threat can mobilise political attention, electoral support and, consequently, active policy changes.

Moreover, Fidler (2007 a, 2007b) asserts that prevention rather than resolution is among the signs of securitism. This is similar to the much earlier insight of Douglas and Wildavsky that modern societies (with a strong focus on science and technology) are concerned with risk prevention and the assignment of blame for generating risks (Douglas and Wildavsky, 1983; Douglas, 1992). Societies adopt strategies for dealing with risk, which is defined as "the probability of an event combined with the magnitude of the losses and gains that it will entail" (Douglas, 1992, p. 39). Originally developed by probability theorists as a mathematically informed neutral decision-making tool, risk has then changed its meaning dramatically. According to Douglas (1992), due to political and social processes, risk has morphed from a neutral term into a synonym of danger. As she discusses in her earlier seminal work *Purity and Danger* (Douglas, 1966)*,* societies build their institutions upon the dialectic between these two poles. An important development in her 1992 book is Douglas' belief that not only traditional societies rely on the sacred and profane dichotomy. While in her 1966 book, she drew a distinction between traditional and modern societies, in her later book, *Risk and Blame*, she built a sophisticated case for the way modern societies operate. The same moral poles (pure and dangerous) inform the institutions of modern social systems, and they are being upheld by ritualistic actions (Douglas, 1992).

The issue with the transformation of risk into danger is its politicization and the consequent ability of political actors to make "spurious" scientific claims (Douglas, 1992, p.14). Thus, while in her earlier work she relied upon technology and science as the true sources of factual danger in the modern world, she later admitted that science is highly politicized and value laden. Thus, moral frameworks become enforced through the language of science that veneers political and ethical agendas. Only when we appreciate the scientific nativism of modern societies can we accept

that danger and purity are, once again, the underlying justifications for value judgments – be they individual or institutional. For example, in probabilistic terms, 'risk' used to involve a sophisticated mathematical calculation of the probability of Bulgaria becoming a hub of extremist activity. Now the term is not used by statisticians, but by politicians, and is heavily value-laden.

State-led strategies to prevent risk impose a systemic order on things and experiences that were previously viewed as disorganized and non-homogenous. For example, a ban on the face-veil, accompanied by a public debate of the dangers of Islam and this form of practice, may change previously positive or neutral attitudes towards face-veiling and organize them according to the interpretation of the State. The following comment by a female respondent of Arab descent, who was also related to several face-veiled women, is exemplary of such attitudinal changes:

> "Well, of course I started getting scared of the face-veil. There was a case in Europe, in France. There was a man disguised. So, if I see a person in a face-veil, I can't tell whether it is a man or a woman. I can't read their expressions. I can't see if it is a good person or a bad person. It is frightening" (Participant 6, 50, Arab).

A securitist would not accept any other interpretations of the said phenomenon but their own, because due to the encroaching peril at hand, all other positions and matters should be deprioritised until the urgency of the problem is brought under control (Fidler, 2007a, b). Pro-bans who had security concerns did, indeed, seem to be holding unnegotiable positions as their assertions were vehement, and the tone of the conversations became belligerent when face-veiled Muslims were mentioned. The scorn of face-veiling can be observed in these quotations:

> ".... say in Iran. It is even called the Islamic Republic of Iran. So there, people can do whatever they want. If they come to Bulgaria, a secular state, they should not wear veils" (Participant 1, 67, Turkish).

> "If I want to cover up, I should go to a country where they cover up" (Participant 8, 22, Turkish).

> "Bulgaria is Christian in the first place. Do you understand? The niqab is banned... If it were up to me, I would send everyone to jail". (Participant 5, 55, Arab).

What is more, the security they were concerned about was not simply organized crime and identity-motivated violence, but the cultural and institutional 'normalcy' that underpinned their ideas of the good (see Taylor, 1989, for a discussion of the good as a general concept). The Taylorist goods are the ideals of a happy life, right choices and dignified existence. Securitists often made references to the way of 'doing things' in Bulgaria, the institutional order in Bulgaria and how the veil is in start conflict with the norms of the good. An interesting aspect of this perspective is that all stakeholders, but the beneficiaries were widely omitted. Beneficiaries were broadly framed as the whole society, sometimes the whole of Europe – all individuals plus the institutions of the State. It seems that this wide framing of the beneficiaries had absorbed actors, owners and victims.

Transformation, worldview, environment

Some viewed the ban as a positive transformation that would bring transparency and security. By 'security', I mean not simply in criminal terms, but the security of what is thought to be Bulgarian and European. Hence, what I mean is also institutional security – in terms of cultural expressions. To paraphrase Douglas (1986), culture is the way things are done. Muslims in Bulgaria do not typically wear the black veil that covers the face. There are some accounts that, before the 1940s, Pomak wore a white face-veil when speaking to outsiders of their villages (Tonev, 1995). However, traditionally, the Bulgarian Muslim woman wears either a white or a colourful headscarf loosely covering the hair (Ghodsee, 2010). Even then, covering is mostly confined to entering a temple, and upon leaving the mosque, women traditionally take their headscarf off, as illustrated by the following comments:

> "Our women wear scarves to the mosque" (Participant 1, 67, Turkish).

> "Yes, of course I do – in the jammiyah (mosque). I take it out of my purse, purify and enter. This is the house of Lord, and those are the rules of entering. I don't even imagine wearing it in the street. The street is no mosque" (Participant 17, 60, Turkish).

> "That came in the nineties, when they saw that they wear face covers in the Turkish Republic and they started here, in the imam schools, like in Rousse, to cover up, and… I am against it. I don't know, I cannot understand it. I cannot grasp it within me" (Participant 4, 60, Pomak).

The transformation, according to this perspective, seems to be correcting a deviance and returning things back to normalcy. The ban in the securitist worldview is a rebalancing mechanism. In Systems Thinking, these mechanisms are called negative feedback loops (Wiener, 1948). The adoption of more conservative Islamic views is regarded as a deviation from the 'normal' and 'desired' state of the social system. Hence, to ban the symbolic expression of them in the form of the face veil is to dampen the unwanted developments of the system and return it to its desirable state. As the burqa symbolizes something unwanted and undesirable, its ban is also symbolic. Still, banning the symbol of the burqa does not necessarily change the thinking that makes this symbol meaningful to different stakeholders. In my conversations with Bulgarians I found that very rarely did the initial perspectives on the veil change, after its ban. For example, Participant 6, who I quoted earlier, shared that she began to feel fear of the veil after it was banned. However, largely, my other respondents did not demonstrate a shift in their perception of the veil and all it symbolizes.

There was also a concern that the desirability of face veiling is influenced by new forms of Islamic practice, entering the country with the geopolitical migration ripples caused by the Arab Spring. Some of my respondents expressed the urgency of drawing a distinction between 'native' and 'foreign' forms of Islam in Bulgaria. A ban would sanction new forms of Islamic worshipping, it would change conservative Muslims and 'Europeanise' them accordingly. Pro-bans of the securitist type are especially supportive of this balancing mechanism for both cultural and physical security. The following quotations are examples:

> "That is with the Arabs, no? I am against that… I have seen, yes. There are attacks that happen. There was one in Germany or France. They are brainwashed. You remember the two towers, right? I saw that more than fifty times, how could they let it happen? Do you ask yourself that question? Some terrorist went on an airplane and managed to pilot it to the biggest trade centre in the world, the World Trade Centre" (Participant 31, 34, Turkish).

"I find it a bit strange that people who spent their entire lives dressing in a different way, suddenly they start doing it. But if they want to, they can, at least at home, for sure. On the other hand, I see on TV that in some cities it has been banned. I find it very hard to pick a side, but if you are not allowed to wear shorts to court, then you cannot wear a burqa either. For me, the ban is normal – we have to respect the institutions of the State" (Participant 2, 61, Turkish).

"It is relevant to Bulgaria in so far as a large part of the population, especially from Syria – refugees from Syria, Afghanistan, Iraq – they are coming to Bulgaria hoping to cross into Europe. …when a Muslim comes to Europe, it would be good if they could respect the laws of that country, not to require the European country to observe his religion, morality, and the laws under which he lived" (Participant 1, 67, Turkish).

The worldview of this perspective revolves around transparency and cultural congruence. For instance, the face-veil conceals the face and the person wearing it is not recognisable. This could serve as a disguise for criminals:

"I think it is good to have it. I know about Morocco – my sister lives there. They have ovens that they use to cook their food. It is called a tajin, and hosts bring meat with vegetables from home. They put the meat in those ovens and the hosts come to collect the food. Once, they found out that the meat came from a new-born baby. That woman never came back, so they could never identify her. I think burqas impel women to criminality in this way" (Participant 32, 28, Arab-Bulgarian).

"What if there is a bomb underneath? What if a man is hiding under?" (Participant 31, 34, Turkish).

"People should leave their faces uncovered, so that they can be recognised if necessary. I do not see why they should hide their faces" (Participant 1, 67, Turkish).

Along the same lines is also the concern that institutional order should be respected and upheld. If the State decides to ban the veil, the citizens must obey, because one should not rely on 'informal institutions'. This stance was taken by Jibril, who despite not allowing me to record him, was open to having a conversation and allowed me to keep written notes. Jibril mentioned that a lot of

the Muslims who 'deviate' from the State do horrible things, such as assassinations of innocent people. He asserted that Muslims who move to Bulgaria must 'bow down' to the law of Bulgaria, which is a Christian country (Jibril, 41, Arab). The same perspective is evident also in the following statements:

> "We cannot make a country inside the country, politics inside politics" (Participant 5, 55, Arab).

> "If they want to wear *burqas*, they should stay in Syria or Afghanistan or Iraq or wherever. If they come to Europe, to a different civilisation which knows no such thing, it would be better if they did not wear *burqas*, because *burqas* have another element, the covering of the face... well... it is not lawful... Even in Turkey Mustafa Kemal, called Ataturk, took religion out of the state and divided it form the State and turned Turkey into a progressive and developing country. In recent times, under the influence of the... fundamentalist emissaries, under the influence of the development of Islam as a religion, there is a tendency in Turkey to return the governance of the State to the laws of Sharia and so on, which is connected to the development of Islam. That is what the media are saying, that is what the politicians are showing. Apart from that, Turkey is a great and big country, which has shown that it can overcome various obstacles. Let us hope that my fears will not come to pass, and the ideas of Mustafa Kemal will not be destroyed". " (Participant 1, 67, Turkish).

Additionally, according to the securitists, the face-veil represents an untypical Muslim practice. Black burqa wearing women are usually tourists, as the autochthonous Muslim populace does not traditionally cover the body and the face with a black cloth. Hence, some of my respondents identified it as inappropriate due to its exotic character that clashes with Bulgarian Muslim traditions. Conversely, veiling is not unthinkable per se – it is acceptable in Muslim majority countries. The following two quotations illustrate this attitude:

> "The feredje is everywhere. That was under the influence of all the refugees who are now settling in Turkey. There are many camps and many refugees. Once they get jobs, they buy real estate and they stay there. But they remain "true" Muslims, that is what they say. So, they remain like they used to be before" (Participant 31, 34, Turkish).

> "Even when we were travelling, there were not so many veiled women in the Turkish cities – it is a village ritual. I would not say that our women, where I lived, in Omurtag and in the villages, were veiled in the way that is now being shown on TV and in the papers. The burqa

or the feredje, I do not know what its actual name is… I had never seen it. Our women wore scarves to the mosque. Sometimes in the street, too, but scarves, not this black cloth. We saw them when people came to Bulgaria– tourists, guests, Arabs, or at least people from the Arabic countries. Their wives were veiled, but that was somehow exotic. After the changes in Bulgaria, after that confrontation between Muslim Bulgarians, Bulgarian Turks and the Bulgarians… well… Arabic Islam slipped in. It came from Saudi Arabia, and those stricter behavioural norms were instituted here violently. I do not like this. I think it should be done where it is acceptable, like in Saudi Arabia and the rest of the Arabic states. Where… like, Islam is a State religion…" (Participant 1, 67, Turkish).

As evident in the previous statements, securitists are concerned with preserving the cultural status quo in the country. New forms of worshipping and those who deviate from Bulgarian Muslim tradition are not acceptable. Christianity is mentioned in the Constitution (1991) as an official State religion, and it seems that even Muslims are aware of and supportive of this fact:

"Here, Bulgaria, it is a Christian country. No matter how Muslim we are, we must respect that. We must respect them like they respect us…" (Participant 5, 55, Arab).

Others believe that the veil does not sit well with Bulgarian Islam. For instance, one woman said that she supports the ban because the face veil as such does not represent Bulgarian Muslims (Participant 3, 25, Pomak). A direct quotation is not available as the interviewee requested deletion of the recording but agreed that I could keep my notes. The same idea was also traceable in other responses:

"Oh, yes, I have seen it on television. I see that many Muslims do it. I have been to Turkey a few times. I see that they do it more and more, but I do not see many people in a full burqa. I would never wear one, personally. My daughter is a young woman, and she does not wear one either. My mother also never wore it" (Participant 2, 61, Turkish).

"Face should be open. In general, in Bulgaria the Muslim scarf is different. Yes, and that is how it should be" (Participant 31, 34, Turkish).

It was a surprise to me that I met securitists whose countries of origin have normalized the face-veil (like Syria, Yemen and Iraq). However, they were fully supportive of the ban on the face-veil in Bulgaria. Justifications again boiled down

to cultural compliance with the ways of life in "a Christian country". The following quotations and notes are exemplary of this attitude. For example, a man said he believed the world is turning against Muslims and they are being scrutinized everywhere. He was not against the face-veil per se but did not believe it should be worn anywhere outside the Muslim world. He added that the State has the right to ban it, because this is a Christian country and it should maintain a Christian outlook style (Jibril, 41, Arab).

An especially interesting case was that of an Arab couple, a husband and a wife. The husband especially placed the removal of the niqab as a prerequisite to moving to Europe:

> "My wife, in Yemen she had a niqab. When she came here, they said the first word, ten years ago, and she took it off. She wore it. I said, "you are coming to Europe, take it off!" (Participant 5, 55, Arab).

Unfortunately, I was not able to access the wife of this man. When asked about the experience of the wife who took off her face-veil, the same respondent reported:

> "You are my husband, I will do what you say...She will not engage with you, she will not want to [be interviewed]. At the beginning, she found it hard. All her life, nobody had seen her face, except her family – brothers, father, that's it. Suddenly, she came to Bulgaria. I want that. The face, you should not conceal it, and so..." (Participant 5, 55, Arab).

For the securitists, the environment also included the wider socio-political situation in Europe. Many European countries have adopted a ban on the veil and the campaigns that surrounded these bans are reverberating in Bulgaria, too:

> "What about the motivation of the people who passed that law in Bulgaria? They did it after they had started talking about niqab bans in Belgium and in Germany. That is part of the counter-terrorism package" (Participant 17, 60, Turkish).

In addition to societal considerations, environmental constraints also include climatic conditions in the Balkans. Thus, to securitists, the face-veil is seen as impractical in warm weather:

> "It is 32 degrees outside. Let us start with this and end with it as well. It is harmful to cover up in such heat. It is bad for the health - the niqab is black" (Participant 17, 60, Turkish).

Beneficiaries, victims, owners and actors

The securitist perspective generally omits the stakeholders of the transformation. Beneficiaries are universally present, as the ban is seen to benefit the whole of Bulgaria and wider Europe. However, no particular comments were made on ownership, action and victimhood. Securitists talk in general of the need to protect Bulgaria from foreign cultural influences. Similarly, they focus on security threats – but both the abstract security of national identity and traditional Islam, and the actual physical security of Bulgarian citizens are talked about in very generalized manner, without the particularities of human beings. For instance, none of the securitists knew a woman using a face-veil, except for Participant 5 who asked his wife to take it off. None made a reference to a political actor or party or discussed the police and the courts. All but one of the respondents failed to identify any victims of the legislation. It was an Arab diaspora representative who felt that the law had victimized all foreign Muslims. In fact, she identified the steering group behind the legislation as people who protest against Muslims:

> "We know of the ban. I heard about some protesting a year or more ago, and it was a big issue. There were protests against Muslims, refugees, against migrants. It is not just the law; this was a lot of events together. And there have been so many accounts from the Syrians just walking on the streets and people pull off their scarves, their hijabs. But it hasn't happened to me personally" (Participant 6, 50, Arab).

Here, Participant 6 is talking about the aftermath of the law, rather than the law itself and who it is aimed at. As it will be seen, a similar view to this was expressed throughout the spectrum of perspectives, especially by pious Muslims. Everyone was concerned that Muslims are being targeted. Other than Participant 6, none of the securitists pointed to victims, owners and beneficiaries. This is interesting and meaningful because the only securitist who expressed awareness of victimhood was a lady who wore the headscarf and migrated to the country some ten years ago. Thus, I believe that her view is an exception to the general securitist perspective,

which limits its scope to the danger the veil poses, and thus excludes the stakeholders from its boundaries.

The broad framing of beneficiaries covers – the entire society – as the ban is seen to protect everyone from the potential harm of violent extremism. Comments about this statement include the following:

> "I don't like it. It makes me nervous. This looks like some sort of terrorism, I do not condone" (Participant 31, 34, Turkish).

Additionally, there were concerns about the influence of this 'new Islam' on the younger generations. It follows that a ban on the face-veil also serves to protect the younger generations from the 'excitement' of radicalisation:

> "I would say the young people are vulnerable to radicalisation with fake religion. There is so much tension between us, the old Muslims and these new Muslim things that are coming. These wrong Muslim ideas are generating so much hatred and conflict and in turn this is creating hostility against all Muslims. This new stream of Islam, I can see it fosters some sort of dependency, it is like a drug. It is very disturbing" (Participant 17, Turkish, 60).

Another pro-ban view on the benefits of the ban include the State itself – with what is believed to be its traditional outlook, values and norms.

> "It is better when people accept you. We must walk *with* society, not against society. I live in Bulgaria, so I have to accept the laws of the Bulgarian Republic. At this moment, I walk with this law. I know law. The hair, there is nothing about hair, it doesn't say if it is allowed or not. But the face, the eyes... We worked in Bulgaria and we live in Bulgaria, we must live like Bulgarians. The religion, nobody pushes me, I do not want the Christian one. But there are laws. The State says that they should be able to see your face. When you go to the Arab world, they tell you to wear a niqab, then you wear a niqab. But we live in Bulgaria. We aren't talking about politics. We are talking about society" (Participant 5, 55, Arab).

Paternalists

The term 'paternalism' evokes negative connotations of stifled agency and the exercise of force upon one's thinking and behaviour. The choice of this label was

not a straightforward one. Perhaps, it was the label hardest to decide upon. Paternalism can be understood either as a violation of one's freedom (Buchanan, 1978) or as a violation of one's autonomy (Dworkin, 1988). Legal philosopher Gerald Dworkin initially defined paternalism as "the interference with a person's liberty of action justified by reasons referring exclusively to the welfare, good, happiness, needs, interests or values of the person being coerced" (Dworkin, 1972, p.65). After criticisms of the narrow notion of freedom that lacks a behavioural component and decision-making (Gert and Culver, 1976), in his later work, Dworkin (1988) moved away from the narrow notion of freedom and focused on autonomy – the capacity of individuals to make moral judgements and act upon them. Moreover, he develops Feinberg's (1987) notion of legal paternalism – encompassing legislation that restricts in order to protect, and extends it to moral paternalism (Dworkin, 2005).

While legal paternalism aims at protecting the person from physical and mental harm, thus improving people's wellbeing, moral paternalism protects from immoral action, thus improving the morals of the restricted. This notion is, indeed, intriguing – legislation that leaves agents morally better off evidences belief in a superior moral position, assumed by those in power who intervene to reshape knowledge (Midgley and Ochoa-Arias, 2001). Thus, the face-veiling ban is an intervention informed by the desire to protect women from the moral degradation that emanates from conservative religious practices, such as wearing the burqa (Bill 654-01-58, 2016).

Dworkin (1972) lists a number of categories of laws that he deems paternalistic, such as laws that require motorcyclists to wear helmets, specialists needing to obtain a license to practice, laws regulating homosexuality, as well as laws forbidding children and women from doing certain types of work. The similarity between all these examples, that without doubt provides fertile soil for debate, is their justification: something is forbidden for the sake of someone's own good. Paternalism, of course, does not only seek to protect those whose actions may hurt themselves, but also wider society.

For example, legislation that requires licensing, health and safety regulations and basic human rights protection are all in the realm of paternalistic legislation, in

Dworkin's (1972, 1988) taxonomy. Furthermore, paternalism can be pure – when the people whose actions are restricted are the same people who are supposed to be protected by the legislation; and impure – when these categories differ. For example, a purely paternalistic legislation would ban gambling for the sake of the gambler or force a Christian scientist to accept a blood transfusion. Conversely, impurely paternalistic legislation would limit the autonomy of one group for the benefit of others – for instance, the outlawing of cancerogenic preservatives in food production.

If one muses at paternalism from a systemic perspective, distinguishing it in pure and impure forms seems futile. Essentially, the distinction between 'pure' and 'impure' paternalism breaks down because of the interconnected nature of societies and their components and regulation. For example, a purely paternalistic legislation that prohibits passengers from riding without a seatbelt does not only concern the passengers. Should the passenger suffer a traffic-related injury or death, wider interests are at stake: their respective family and dependents, as well as the national health provider may suffer negative consequences. Thus, even purely paternalistic laws rarely concern only the interests of the person whose autonomy is restricted. There is almost always a wider social concern. This criticism notwithstanding, paternalism seems a befitting title for the worldview of this segment of my respondents: legislation that forbids women from wearing a face-veil for their own good as well as for the good of society, is paternalistic. Six of my respondents felt that the freedom of women was jeopardized by the veil and supported the ban, and I have labelled them as 'paternalists'.

Transformation, worldview, environment

The dominant view of this group is that face-veiling is unacceptable and cannot emanate from someone's own volition. All paternalists *par excellence* spoke of some sort of violence. According to Galtung (1969), violence is not simply a direct act where an actor causes physical or mental harm. It could also be deeply entrenched in the institutional order of a social group, and then it becomes structural. In cases of structural violence, people still experience harm. Galtung's (1969) example is   domestic violence: if a husband beats his wife, this is direct

violence; however, if a million husbands beat their wives and this is socially acceptable, then violence is entrenched in the social structure, and hence is structural. Paternalists are invested in preventing acts of structural violence. Hence, the transformation is one that liberates women from oppressive social structures:

> "Freedom for them, they are forced into it. There's this saying that too much of a saint cannot please God" (Participant 17, Turkish, 60).

Another respondent, Participant 3, said that in her village nobody wears the face-veil and it is only the Gypsies who do. She calls it a Gypsy ritual, not a Pomak one. When asked about the difference, she says Pomaks wear white scarves, if any, and are modern people (Participant 3, 25, Pomak). 'Gypsy' is a problematic term used for the minority that is now called Roma. After 1989 and the collapse of the Communist project across Eastern Europe, the term Roma was introduced as a new label, because 'Gypsy' was considered a "pejorative exonym" (Bancroft, 2005, p. 3). Thus, some paternalists expressed negative opinions of Roma people, making references to their lack of development as a community and backwardness. This attitude was evident in the following quotations:

> "I remember that they were constantly showing us gypsies from Pazardzhik, who had suddenly decided to wear burqas. Their husbands had thick beards. It is difficult for me to speak on the subject. I did not take any specific interest in it, but that... ethnicity, they are very easy to enlist into all kinds of religious communities. Some become evangelists, others become fervent Muslims. Personally, I think they were promised privileges to induce them to wear burqas...... Well, I think that they live in poverty. The vast majority of them do. It is clear to me that these groups are vulnerable. They attract preachers of all creeds. And I think that... if some sum was offered, some aid, or some acquisition, I think they might have become members of the religious community because of that. Without thinking too much. Just like they used to be Christians with Bulgarian names. If I recall correctly, one of the main actors was on trial, he used to be an evangelist before he became Muslim. I think it was like that" (Participant 2, Turkish, 61).

> "the gypsies, who were being paid, the women most of all, they were being paid to wear *burqas* and to cover themselves. Those are the rumours. In the press and in mass media there has been data that... in cities that have... like in Pazardzhik, which has a big gypsy

ghetto, missionaries, Saudi missionaries go around and pay gypsies to study Islam and to cover up their wives" (Participant 1, Turkish, 67).

The same respondent went on to talk about the difference between the Bulgarian Turks and the Roma. Her comments are evident of a marginalizing attitude that does not necessarily relate to the veil but illuminates older patterns of profanitizing. The same attitude is also detectable in other respondents' comments:

"I do not identify with them. They decided to do that, they can do it. I am neither ashamed of them nor because of them. They are their own people. I have my own environment. Come to think of it... I think we have a different attitude to life. They are very keen on their traditions. They like their families, they are a bit freer, there is more responsibility among us. To parents. To children. We are not people who give up everything just to be merry. Song and dance without thinking of the future. I think they are more carefree than us, and the Bulgarians, too" (Participant 2, Turkish, 61).

"But I am simply not a gypsy. The big differences... if we are talking about the gypsies, they are a separate group, they have nothing to do with Bulgarian Islam, nothing... they are, how to say this... newly converted Muslims, who did it for money, for goods, after the changes. The Bulgarian Muslims had access to almost all spheres of life in Bulgaria. Art, industry, as you can see I have a graduate degree, even though I am Muslim. There are gypsies everywhere. There are gypsies everywhere. Some, I... the ones I know were hard-working and nice people, but there is also trash, who... they are just very insolent now, very insolent, especially the young ones, junkies, the gypsy neighbourhood in Varna is... it just cannot be described. It is like the Bronx in New York" (Participant 1, Turkish, 67).

There is another interesting line of argument that could be explored. Galtung (1969) affirms that in societies where life expectancies between groups vary, structural violence is present. Roma across Europe live on average 5 to 20 years less than non-Roma due to overall poor health status (European Commission, 2014). More recent reports narrate that infant mortality among Bulgarian Roma is twice as high as that in the total Bulgarian population, and this sombre statistic has been found repeatedly over the past decade without much fluctuation (Roma Inclusion Secretariat 2015). This stark evidence of inequality is coupled with many other forms of evidence, such as higher unemployment rates, teenage pregnancy, illiteracy, etc. (EPHA, 2019).

In the criminal justice system, Roma have been subject to racial profiling and unfair imprisonment (Gounev and Bezlov, 2006). Additionally, while Bulgarians are more likely to be the victims of property crime such as theft, Roma are more vulnerable to so-called contact crimes – forms of assault. All of these facts paint a picture of structural violence. Hence, there is the existing assumption that Roma people, especially women, are suffering from the crushing conditions and social rules of their communities.

To ban the veil is to protect them from male despotism. For example, Participant 3 says the ones who wear the full veil are uneducated, simple. I ask her whether she has seen a person in a face veil. She says she has, but only when they pass with the car through the Gypsy neighbourhoods, and she describes them as poor places with miserable people. I ask her, how does this make her feel? – she says she pities the women in veils (Participant 3, 25, Pomak). This statement, and the ones to follow, exemplify the prime concern of paternalists. While anti-bans in general are concerned with Bulgarian identity and its sacred (safe, normalized) expressions, paternalists are concretely focusing on Bulgarian women. On the cultural compliance front, there is striking incompatibility between being a Bulgarian woman and wearing a face-veil, as illustrated in the following statements:

> "I have not seen anyone like that in our village. I do not know any people like that" (Participant 9, 26, Turkish).

> "I was in Istanbul recently. There are areas there, locally. A sufficiently active imam can force the women to wear feredje. That is a fashion, too. Erdogan's wife wears a headscarf. They all wear headscarves. It is a fashion" (Participant 31, 34, Turkish).

> "I do not know why they wear all that. I would never do it, even if somebody told me that it is mandatory, I would die before I... I do not know why I should hide. That is, it. I do not know" (Participant 8, 22, Turkish).

Some young working women asserted they would never wear it. The reasons they gave were various - some said they had consulted the scriptures and found it was not mandatory, while others considered it clashing with their Europeanness. Once

again, cultural compliance is a recurring theme in the pro-ban paternalist perspective:

> "I would not cover my face…I would not. Maybe because I live in Europe, or maybe because of my worldview" (Participant 32, 28, Arab-Bulgarian).

> " I grew up in a particular environment, here in Bulgaria. I cannot accept that, nor can I accept being made to wear that. It is completely absurd. I am against wearing it myself and also against other people wearing it" (Participant 9, 26, Turkish).

> "Because you are not dressed like them, you are wearing jeans or a T-shirt. They become different. It is like that. It is a big limitation, really. If you ask them, if people can see your hair, then they shouldn't. Only your husband can see your hair. Even if they can't see your hair, if you are minded to do something, you will do it. A headscarf solves nothing. Maybe if I was in Turkey, if I was covered up, I would feel different. But I think in Turkey the difference is big. Regrettably… Because it is a limitation – to veil" (Participant 7, 27, Turkish).

To some paternalists, the face-veil ban works to protect the emancipation of women. The respondents who were concerned with emancipation clearly viewed the veil as a step back from recent progress made in terms of gender equality. Emancipation was hard to achieve and must be sustained, as it could easily deteriorate under a more conservative form of governance:

> "Everyone should be free to show their charms in whatever way they want to" (Participant 4, 60, Pomak).

> "That is an anachronism. Kemal Ataturk got rid of them as early as 1906, I think. Women should be uncovered… Those years are long gone… Stone Age… Mainly because they are outdated, women are emancipated now. They became equal to men" (Participant 13, 49, Roma).

Another respondent, Participant 3, expressed support for the ban. She was concerned about face-veiling because she thought it might catch on, and other people may start saying women should cover their faces, which she viewed as dangerous. I asked her why – she replied, because she wouldn't be able to go out,

r go to study (Participant 3, Pomak, 25). And then Participant 3 made what was, for me, the most surprising cultural reference – the 'Handmaiden's Tale' series[27].

Beneficiaries, victims, owners and actors

The paternalist perspective does not envision owners and actors of the transformation. The ban is a positive transformation that serves to liberate and morally improve the people it targets. Still, the beneficiary and victim dynamics are present in this perspective, although it seems hard, even impossible, for the respondents to empathise with the desire to wear a face-veil. However, there is awareness of the beneficiaries of the veil itself, and by proxy – those beneficiaries would become victims should the veil be banned. A popular paternalist view was that the face-veil is something that benefits men and is forced upon women. Thus, women would benefit from its banning, while men would suffer:

"I think it might be their husbands. I judge from that woman that I spoke to… It is a coercion" (Participant 9, 26, Turkish).

"I can see that men want to protect what is their own, but we are not theirs. We are not objects. We are living people. I also think that covering your face does not really prevent you from doing whatever you want" (Participant 32, 28, Arab-Bulgarian).

"Yes. I do not have anything against those people. Just, the law, I do not know, it is men telling women what to do, because they do not want them staring at other men, mostly… Well. There are women in Bulgaria who get with somebody and he tells them, 'I don't want you wearing short skirts'. They get jealous, there is jealousy. They do not want you to… attract attention. To dress up. It exists. That is why I think that when men say something, jealous men, they do not want other men staring at their wives. There is jealousy and trouble" (Participant 8, 22, Turkish).

---

[27] A dystopian drama based on a book by Margaret Atwood (1985).

On the other hand, paternalists assume that face-veiling is associated with some sort of structural pressures, some sort of coercion and abnegation of individual agency:

 "for a girl to cover up, I doubt it was her decision" (Participant 7, 27, Turkish).

"In Bulgaria, why would they hide? They can do it where it is legal. Here, Bulgaria is liberal, anyone can, right? But maybe their husbands do not let them, after all they come from there, from abroad, and they go on. Yes." (Participant 8, 22, Turkish).

The paternalist view demonstrates empathy and awareness of the victim-beneficiary dynamics, which are seen as oppressive pre-ban. In light of this observation, it follows that, although the other stakeholders (owners and actors) are omitted, paternalists do consider people who are directly affected by the ban. This is important, as compared with securitists, paternalists show a wider spectrum in their perspective as well as a broader systemic awareness. This draws a distinction between securitists and paternalists – while the former are set in their ways and disregard all stakeholders, paternalists include them in their evaluation of the ban.

Anti-bans: humanists and anti-securitists

The largest group I identified were the people who position themselves against the face-veiling legislation (22 people). As this group is in stark disagreement with the legislation and its official justification, I have labelled them 'anti-bans'. Similar to the pro-ban perspective, the anti-ban perspective as a whole is also aware of rapid globalization and the movement of values and ways of life. However, unlike pro-bans, they do not feel threatened by these changes. Additionally,, the cross-fertilisation of cultural practices in the past is not seen as negative. The following statements demonstrate this relaxed attitude:

"None in my village, but I know especially in the south, they do. It is because they visit Turkey or have relatives there, who moved, and they get influenced more by Turkey. Up here it is different" (Participant 18, 58, convert).

"That is an anachronism. But I think it is good. After all, women should cover up... So that others do not lust after her, because they can very easily tempt her into sin. That is the truth. That is why they accepted it during Turkish rule, especially in Bulgaria, all the maidens wore niqab" (Participant 12, 62, Roma).

People who position themselves against the ban have different motivations, and accordingly I have clustered them around their main concerns – the securitizing of public life (anti-securitists) and the issues with denying someone's human need for non-violent worship (humanists). Some anti-bans saw the enactment of Muslim pious identities as a human right that should be protected, not abnegated by the State – the humanists.

Alongside humanists, other anti-bans expressed dissent against the State as an amalgamation of political parties who seek to polarize the population to recruit voters. These respondents, too, were aware of the effects that a securitist discourse has upon public attitudes towards Muslims. Hence, this group bears the name 'anti-securitists'.

The transformation, under the anti-ban perspective, is limiting the rights of pious Muslim citizens. There is also a wider awareness of victimization of Muslim populations as a whole. Additionally, there is a sense of the assignment of blame, which the legislation condones. While pro-bans showed less awareness of distinct stakeholders in the transformation process, anti-bans had a clear position on the different roles that stakeholders play, as well as the dynamics between owners, actors and victims. This awareness can be seen in the following statements:

"They are not bad people, Muslims. Some people blame them, but I have never seen anything bad from them. My adoptive family is Turkish, I have friends who are Turkish, we get on" (Participant 34, 58, Roma-Turkish).

"There is no Bulgaria anymore. There is no Bulgaria. Is there Bulgaria? Does it have a President? It does not. We are being run by a group of thieves. They only use stories to turn us against each other. Did they make roads? Did they open new work for us?" (Participant 30, 79, Roma).

Anti-securitists

Transformation, worldview, environment

Anti-securitists are the mirror image of the securitists. They, too, are invested in the political situation that surrounds the face-veiling ban, and also are interested in politics in general. Anti-securitists are namely this – sceptical of the securitist discourse and opposed to it. Anti-securitists often make references to State industries, the economy, education and inequality issues that must be resolved by the Government. Conversely, the transformation was viewed as a political enterprise to gain supporters for the then upcoming elections, and as a distraction for the population, so that attention could be drawn away from pressing socio-political concerns. Nine people expressed anti-securitist attitudes, while two of them also spoke of the universal human right to religious freedom. Hence, two of the anti-bans are cited in both perspectives. The anti-securitist attitude towards the veil is almost indifferent: it is something normal that some people wish to wear:

> "My mother and grandmother always had it in the mosque. So does my wife. You go in the early morning to the mosque on Ramadan, and you are all dressed up, including headwear for them" (Participant 11, 37, Turkish).

> "People should be left alone to wear it. But, someone should make an effort to educate, to find jobs for these people. This is what should be done. Not the police to run around and fine them, although knowing our police, I would not be surprised if they just wait on bribes and don't do their jobs. However, it is not the way you deal with the burqa. If you are worried about something, you need to see why it is happening—why are Muslim women covering up? And why is this the biggest problem in Bulgaria? They make so much noise about it. How about the hospitals, education, the big stuff?" (Participant 29, 33, Gagauz).

From this perspective, the ban serves as a smokescreen to distract people from other pressing issues that should be resolved by governments:

> "It is not a big deal. We have real problems in Bulgaria… There are many problems. We can no longer solve them. Terrorism is not one of them" (Participant 21, 60, Gagauz).

"who cares about the niqab? Why is the niqab the star of the country? Bullshit. I think it is silly. I have to start from the smallest point, not the largest" (Participant 33, 23, Arab).

"Right now, we are in the fore, because there are few of us and they can tell us apart. I told you, it is a political campaign, make a little noise, make it look like something is happening, something is being done. They are throwing sand in people's eyes" (Participant 28, 32, Turkish).

The environmental constraints in this sub-perspective are very much in tune with the generic anti-ban view on pervasive, global Islamophobia:

"Look, even in Saudi Arabia, they are beginning to grow more accepting, they're even thinking of opening churches in Saudi Arabia. They are opening up to Christianity, but the world is closing for Muslims. A large part of Bulgarians do not know what a hijab or a niqabi s. To them, everything is illegal. Like I said, before my mum died, I worked with my head covered. A client came and he was shocked. He refused to be served by me, because I was wearing a burqa. And he called the police to report a crime. Ten minutes later, the police came. They apologised profusely. They took my ID, to take down my details, because I had been accused of a crime. I asked about the grounds, they said that it was because I had been wearing a burqa. And the policeman called the precinct and said that I was not wearing a burqa, that I was wearing a normal white headscarf." (Participant 15, 36, Arab-Bulgarian).

"I'd say some people in Bulgaria, some Bulgarians are against Muslims and nothing can be done about that. Such bans instigate a minimal conflict. It is minimal but potent enough to generate votes" (Participant 35, 36, Turkish).

Anti-securitists doubt the existence of security threats in Bulgaria, but they do demonstrate awareness of global security concerns:

"I fear nothing in life, in this taxi I have seen everything... people are afraid in the street, because when someone covers up, you can't see their eyes, you can't see their face, they might be up to anything. There are all kinds of crazies in Germany, in France, in England, they go around, they fight, and they shoot" (Participant 11, 37, Turkish).

"And... generally, I am saddened by the world's understanding of Islam. It saddens me even more that there are Muslims, who give Islam a really, really bad name. And, now, I understand those people, the ones in Bulgaria, who see refugees or some pseudo Turks,

they're not even Turks, they call themselves Muslims and they do not know what Islam is, but they call themselves that and they wreak havoc all over the world. Understandably, people hate those people and Islam with them...

It is like someone is doing it on purpose. They see that the situation is tense, they try to start fires, to cause problems. Why? Show Islam as it is, pure, good, beautiful, true, not this bullshit, terrorism and so on. A little bit of peace, I want a little bit of peace. If anyone cares what it was like when our Prophet lived... he lived in peace with Jews, with Christians, with pagans, he killed no-one for it. We suddenly forgot this; we only follow those who came after him. That's the end. War! The funniest thing is those terrorists do their worst in Muslim countries. In Lebanon, in Syria. Okay, they are Muslim, why fight them? Because they're not the right kind of Muslim. What kind of believer does not use their head? You are told something, you do it. They do not think about the logic of what they do" (Participant 15, 36, Arab-Bulgarian).

Although anti-securitists are alert to the threats posed by extremism, they evaluate State intervention negatively. Banning behaviour seems counter-intuitive or a plainly unacceptable approach to moderate people's behaviour:

"No ban will help with terrorism. I know this. I am Syrian and I ran from this—being hard is what feeds terrorism. Softness is what stops it" (Abdul, 23, Syrian).

"It is nasty to ban things. I do not like bans... Everyone has their own ideas about their religion, about their spirituality. I do not like interference... I bought one like that too, shiny. I have two or three for day wear.... It really is comfortable. It would be a perfect world if nobody interfered and everyone could do what they felt was right" (Participant 15, 36, Arab-Bulgarian).

"I believe, I believe. Some people do not believe, you know. Well, we speak, they just do not believe. They say, 'I have not seen God, how can I believe?'... they have not seen them, but everyone is entitled to their perspective, right? Back in the day, Ataturk got rid of them. Do you understand, Ataturk? It didn't work out for him - they wear the burqa in Turkey now, here too. You can't get rid of it, people want it, let them have it" (Participant 34, 58, Roma-Turkish).

"What can I say, terrorism... I cannot tell you. I have never seen any threats. Not from the Arabs, not from the Turks. People make these things up" (Participant 21, 60, Gagauz).

Interestingly anti-securitists also reflect on the ecological aspects of the environment in Bulgaria. By contrast with securitists who have mentioned the summer heat as an inhospitable environment for a face veil, anti-securitists assert its benefits – in the hotter Arab countries as well as in general:

> "One of the reasons for wearing burqas to protect the body from various meteorological elements, like sand and sun and so on. I too cover up, but... you can see my face. I respect women, who have taken it upon themselves to wear burqas. There is no real difference between an ordinary headscarf and a burqa. There is only a superadded piece of cloth, which covers the face." (Participant 16, Turkish, 34).

> "It is comfortable, especially when they have sandstorms. The men even wear masks, otherwise you can't breathe. It also protects your face from the sun. So, think for yourself, does religion force you to wear that thing? Why do people in Saudi Arabia, Dubai, why do they wear it? They're in the desert. It protects them. Even men wear it. Those things they put on their heads; you know what they do. Itis for their protection, because otherwise you can't breathe, because of the sand. That is not a religious obligation, it is a traditional practice in Muslim countries which are in the desert. I would also wear it if I am allowed to because for the time I did veil my face, my skin looked glorious. It can be really god for your face. But I would not wear it at any cost." (Participant 15, 36, Arab-Bulgarian).

With regards to State-lead intervention in spiritual practices, the two anti-ban camps although united by their distrust in politics, had different perspectives. Both seemed to have lost respect for the institutions of the State: aside from demonstrating distrust for the particular government in power (as Bulgaria is a parliamentary democracy where new elections bring about a new Parliament and a new Cabinet of Ministers every 4 years), the two camps showed evidence of a withdrawal from politics in general. The humanists, however, were more concerned with people's dignity, humanity and its abnegation, while the anti-securitists focused more narrowly on the State and its failure to fulfil its obligations to citizens. The distrust and overall pejorative attitude towards politics in general and the State in particular is evident in the following statements:

"The patriots don't care about security; it is a sham. They only care about filling their own pockets" (Participant 34, 58, Roma-Turkish).

"The law in Bulgaria is for the poor. They pay the price of the law, not the rich" (Participant 25, 50, Roma).

"There are better things to ban than that. Narcotics... you know, they affect girls, schoolgirls and children. The centre is full of prostitutes and the police protect them. Is that a life? Pimps make money out of other people" (Participant 25, 50, Roma).

"They're humiliating them. They should leave them alone; everyone should do what they want. We have bigger problems. We need food, we need drink. You can't, like, I work 12 hours a day, my hands are calloused, I can't see, all to make ends meet. Those are our problems. Who wears a veil, how they wear it, everyone should do what they want? They're all the same [politicians]. Here, they all lie, they say they will increase wages, that there will be a minimum wage. Right now, the city council in Varna said that there will be a minimum taxi fare. There are people, all the time... A new taxi company shows up, they undercut us, I can't get clients, I do nothing all day, I lose money, petrol, battery, all day long... So, they said, we will have a minimum rate, if someone wants more–they can try. And they said this so many times. And I thought there would be progress, and they went silent. And it is like that every year, all summer long we undercut each other. Stealing each other's bread" (Participant 11, 37, Turkish).

"Why don't they do something else? – put a fence on this street, for example, so that children do not fall under the cars" (Participant 33, 23, Arab).

Beneficiaries, victims, owners and actors

Anti-securitists have an articulate position about the stakeholders involved in the transformation. The beneficiaries and the owners are one and the same – political parties who pursue voter recruitment:

"Yes, the patriots will get their electorate as well, again through fear. The Bulgarians who are scared of Islam will vote too. They work together, all political parties work together. We do not have politicians, they do nothing for the people – they only care about their own businesses, to launch their own firms, to bid for large projects. That's it - they don't care about the people" (Participant 35, 36, Turkish).

"This law was a political campaign, an election campaign. Totally. Is this the biggest Bulgarian problem? That the gypsies are wearing niqabs?" (Participant 27, 55, Turkish).

"Any man can be fake. That is why you cannot say that Muslims are terrorists. Everyone else is an angel. After all, we are all human. Now there are many Christians in Bulgaria who are like Ataka... These idiot politicians!" (Participant 33, 23, Arab).

"I think the law is populist, plain and simple. It is there to create tension between people. I have seen and witnessed this. Everyone should respect everyone else. If a person has decided to cover up and does nothing wrong, does no harm to anyone, I don't see why they should be banned from doing what they want" (Participant 15, 36, Arab-Bulgarian).

The owners and the actors of the transformation are often lumped together under a common pronoun, "they", which indicates distance and otherness from the speaker. The owner is often the State, or political parties who championed the ban and its campaign, and humanists express their disagreement with this stakeholder:

"The State isn't right in what they are saying–whoever wants to steal, to rape, to kill–they will do it with or without a niqab" (Participant 27, 55, Turkish).

"They are plotting [...] The politicians. To win votes – this is what the fuss is" (Participant 21, 60, Gagauz).

In this sub-perspective, as with all the anti-bans, there was a clear awareness of victimhood. The victims of this transformation were various. First, there were the people who became persuaded to cast their vote in the favour of NFSB – the party who was seen to have scapegoated pious Muslims. Then, there were pious Muslims themselves who, as seen previously, were said to have suffered emotionally. Some of them were fined and suffered financial damages after the ban. Third, there were Muslims and minorities in general. The following statements illustrate this perspective's view on victimhood and who it includes:

"Such bans instigate a minimal conflict. It is minimal but potent enough to generate votes. But I think the aim of this law is to further exclude these people from society. For example,, these people who are ready to wear burqas, to take them off, then they will be shaken. And then they will support the party who pretends to defend their rights. They say they want to change them, so that these people participate in society. But I will also tell you that so many parties are using this law, are using any law to divide people. This law has a purely political aim to separate people. This way the ones with the burqas, who are now forced to take

them off, will want to support DPS because they will feel frightened" (Participant 35, 36, Turkish).

"I think that Islam is overused to recruit voters across the world, not only here" (Participant 27, 55, Turkish).

"Plus, when they ban it, it is for the worst for all of us, for all Muslims. I can feel it myself. People are giving me bad looks in the streets. Over the last 10 years, as terrorism became more common, people started giving me dirty looks, sometimes they shoot something. Everyone who knows me is fine, those are some strangers. Well, it hurts. It hurts me so much. But I tell myself, I pray to Allah to enlighten them, to forgive us all. They don't know Islam; terrorists don't know Islam either. I pray for everyone to receive guidance. I pray for the terrorists to receive guidance and to stop what they are doing, God guide us all..." (Participant 27, 55, Turkish).

"They don't have a hospital, don't have schools. How do you expect to govern these people without the main services? It won't happen with police only, they need other stuff, care. And in the end, we have all entitled to the same stuff and have the same obligations to the country. This is what I think" (Participant 29, 33, Gagauz)

Humanists

I have used the label of 'humanism' broadly, and it should not be confused with philosophical humanism, despite the fact that the label itself is inspired by the practical philosophy of my respondents.The term 'humanists' refers to recognition of our shared humanity and the need for freedom to worship. For a brief yet in-depth discussion of the philosophical stream of humanism, please consult Law (2011). Humanism has often been associated with secularism, which is not the meaning I wish to ascribe to this perspective, as there are pious people who subscribe to it. Hence, I use it in the sense of an appeal to our common human nature and the view that wearing a veil is a human right that the State is violating.

Transformation, worldview, environment

In the humanist perspective, the face-veil is normal. There is a spectrum of perspectives on the veil - to some it is simply acceptable, to others it is a cherished

path to paradise. To the pious, it could be a sacred practice that purifies the woman, and by extension, society itself.

It is a good time to introduce an important caveat to my analysis. I was pondering whether to keep this comment for later and develop it in the section on the limitations of my research (Chapter 9), but since it feels so fundamental, I will present it in this section and return to it in the last paragraphs of the thesis. It is crucial to note that there may be people among the humanists who were adopting this perspective only to legitimize their own way of life.

Indeed, it is possible that veiled women would not defend the freedom of others in a hypothetical situation where the veil was enforced by law. After all, my research is into the shaping of perspectives under conditions of dominance and subordination. It is possible that many humanists manifest as such because they are in a subordinate position. Upon the eventuality of being dominant, they may move out of the humanist camp. Still, it was not possible to separate general humanists and face-veiling ones, or ones who promote the face veil, because they were all making references to fundamental common humanity and the principle of allowing everyone to express themselves, as long as they do not harm others (this will become apparent in the following paragraphs).

The assumption that people would subscribe to a different position, had the intervention been different, is also valid for pro-bans, securitists, anti-securitists and so on. If an intervention is in stark conflict with the values upheld by the individual, their coping strategies and positioning could vary compared to when the intervention is in accord with their values. However, these speculations could only bring robust conclusions if they were properly investigated. Due to the finite time available for my PhD project, and the context of my study (enforcement of a ban, with no possibility of comparing it with a situation in which the veil itself was enforced), I acknowledge this limitation on my interpretation of the data, but focus on what my respondents were telling me.

 To the humanist sub-perspective, as to pro-bans in general, and securitists in particular, the veil is a synecdoche of Islam. However, while the securitists saw the face-veiling practice as foreign and perilous, these respondents were open to it. Some humanists believed that exactly 'this Islam' is what transformed their lives

for the better.   The following statements are illustrative of this belief. These quotations illustrate a personal experience of veiling as well as the comment of an observer who lived in the same village with women who started veiling:

> "Well... I can see the benefit. For our community. For the family. For the moral sense of the community. It is better, it is better, look here now, and we are helping each other out. They are helping us too; they send us books. They send them to us, they are teaching us. Our boys, they had problems, they did those... things. Drugs and alcohol in the neighbourhood. It wasn't nice. Now, through Islam, people are cleaner" (Participant 26, 34, Roma).

> " I felt better, as if I was ... protected. As if Allah had covered me up and He was protecting me, that is how I felt... Well they tell us, the people, right... you should wear this. We say this: "Okay". And, like, I'm sure, like I have one faith in my soul, one in my heart, I am clean, you know? Do you understand? I do not want to have sins. I want to be like it says in the hadiths. Only I have read, you know, what it says there. That women should wear modest clothes... they should... when I was young, I would roll up my skirt. But now I know, then I was too thick. Now, modest clothes—Heaven! The road points to it. Whoever doesn't wear them, they don't have faith in their souls, they cannot find paradise" (Participant 23, 42, Roma).

The following two comments were made by men who supported the veil and pronounced a positive value judgement on it in general. The first comment I will present to illustrate the humanist perspective was made by a man who did not know any women who cover their faces, but still supported the idea in principle:

> "I would be very glad if it turns out that there are people like that [wearing the face-veil] here. Honest... Men's eyes will flash when they see it. That is honesty" (Participant 24, 24, Roma).

> "Clearly, nobody supports that, unlike me. The word Pazardzhik means *pazar*, a big market. That is the name of the place in translation. It was a big market back in the day. At the moment, it is mostly Muslim, and it is clear that they want that [the veil]" (Participant 12, 62, Roma).

Wearing the veil is seen as a prevention, a behavioural barrier to what is seen as sinful (lusting after female beauty). Finally, the last comment was made by an elderly gentleman who also seemed to be sharing Participant 24'sendorsement of the veil:

> "Well, in our part, they started wearing this black dress recently. They are thinking it makes them holier... Well, if she is covered, you could not say 'what a beautiful woman'... That's it. You avoid sin, she avoids sin. It is good" (Participant 30, 79, Roma).

Recall that the freedom to express one's beauty was upheld as a value by the paternalists. It is intriguing that the same issue, but interpreted very differently, is at the core of the moral logic of the supporters of the veil.

Since veiling is normal, then its ban is in conflict with normalcy. The transformation for the women who wear the face-veil is insulting, and sometimes a traumatic experience:

> "Since that law appeared, they started going around our neighbourhood. They don't usually have that many men in our neighbourhood. And the policemen... they stand here, and if they see someone come out of their front door like this, they immediately stop them, they start asking questions, they ask the woman things, they write, they take her in for questioning, if she doesn't want to take it off. They take their ID cards..." (Participant 23, 42, Roma).

> " it is only because of this... hullabaloo. That is why I took it off. It is not like I felt bad, ...Now I no longer do. I do not cover up, because of those fines, 200-300 lev... And once I saw them get fined a few times, I decided to take it off for good" (Participant 26, 34, Roma).

Additionally, anti-bans of the humanist kind also demonstrate dissent against the State and its institutions. Similarly, to the pro-ban claim that laws should be observed, anti-bans note that the social norms they obey are highly contingent on their immediate environment, their micro-society. The source of right and wrong, of the Taylorist good, is either in the community and its institutions (family network, marriage) or in the divine order of religion. The following statement illustrates this argument:

"On the whole, I do not like politics. I do not like to deal with politics" (Participant 16, 34, Turkish).

"Well... Law, not law, I don't know. Our laws, those are the laws of the neighbourhood – I tell you. When I go to the city, I am careful. Here, in the neighbourhood, we have different laws. I don't know. I do as I am told. I do not live with the law. What law is that to me? My husband is my law. Right... Here is the neighbourhood, the law... Those are our laws, I tell you... I do... Yes. I do not care anymore about the law. I live here with this man, I live here with these people, what do the others want with me? That they will throw me out. Where will I go? Marry the law? I don't need that" (Participant 23, 42, Roma).

"Everyone has to respect each other's religion. We believe in Allah. God is one. It does not matter if it is Allah or God. I go to the mosque every Friday. We celebrate bairams, too... At the moment, they mostly do not wear niqabs, but scarves. To hide their hair. That is part of a woman's beauty that has to stay hidden. Nothing wrong with a scarf or a niqab - it is part of religion." (Participant 12, Roma, 62).

Some humanists have a personal experience with the face-veil. Others have never seen it. Some of the veil supporters wear the veil or are related to someone who does. Others simply see it as a beneficial practice that either improves the morals of society or is symbolic evidence of higher morals. Regardless of the role the face-veil plays in their lives - whether they wear it or are related to someone who does, or whether it is not present in their life at all other than as an idea – this group is united by the belief that face-veiling is a normal practice.

From this perspective, the transformation (from the face veil being permitted to being banned) is stripping people of their dignity and their freedom to worship God. Supporters of the humanist perspective often make references to our inherent mutual humanity as a source for respect and understanding of the differences between various ways of life. Additionally, humanists are interested in freedom of conviction and freedom of expression. Some made explicitly negative comments about the ban, while others simply talked about freedom and respect:

"As long as no one comes to me and interferes with my rights, take them away, in the way they did that with the burqa" (Participant 16, 34, Turkish).

"If they want, they can wear them. If they do not, they should not" (Participant 18, 58, Bulgarian convert).

"I am merely saying that they should wear whatever they want. If they want the shalwar, if they want the feredje, that is fine…" (Participant 21, 60, Gagauz).

"Burqas in Bulgaria are a personal conviction of parts of the Muslim populace, which again boils down to personal choice […] the sisters who wear burqas in Bulgaria have decided to wear them. Because of their convictions, not for other, secondary aims and ideas" (Participant 16, 34, Turkish).

"The freedom to choose, the freedom to live where you want. That liberty came after the changes [the collapse of the communist system]. A person is free to live as they want. They can practice any religion; they can do whatever they want. It is a personal matter, in my view. It should not be imposed" (Participant 22, 70, Bulgarian convert).

"I have nothing against them, either. Everyone can wear whatever they want. I understand them. Look, I have never seen anyone wearing that. It might happen in the villages around Burgas, but I do not believe that there are many people like that. They can wear them. People can wear whatever they want" (Participant 14, 46, Turkish).

"Well, it seems strange to me. But who am I to say, I am not Muslim, and my parents never wore this or made me wear it? It has nothing to do with me… But what everyone does is their business. If they like it, they should wear it. Everyone should be free" (Participant 29, 33, Gagauz).

A similar view was expressed by Participant 19, who did not allow a recording but agreed to written notes being kept. She said she believes that people should be free to wear a headscarf or a veil. She was against the ban and said that pious people will suffer because of political propaganda. She believes that there is a lot of hate against Muslims in Bulgaria already, and such a ban will make the situation worse as it draws attention to them. She commented that she has seen people in face-veils on the street but does not personally know anyone with one (Participant 19, 23, Pomak).

Humanists talk of tolerance and understanding of different cultures. Much like the securitists, their perspective is aware of globalization and the movement of people and ideas. However, these dynamics do not cause fear and insecurity. In fact, the humanists, just like the securitists, made references to Europe and the way people behave within distinct migrant communities there – indicating the value of inclusion:

> "An Indian, if they come to Europe, would they change their "costume", their customs and norms? They would not. When I went to England, they were still typical Indians" (Participant 22, 70, Bulgarian convert).

> "I have been to Europe and they wear the feredje [burqa] there without a problem. Nobody tells them anything, nobody cares or stops people." (Participant 25, 50, Roma)

> "In England there are all kinds of people. Nobody cares too much how the other one is dressed. There are many fully-covered in England" (Participant 24, 22, Roma)

The environmental constraints of the transformation are again socio-political. This perspective does not regard the climate as an obstacle to, or a reason to ban, wearing the veil. The environmental constraints of the ban in this perspective are seen as limits to the inclusion of Muslim minorities. There is a sense of long-term marginalization, the feeling of Roma being a minor element in the social system, as well as non-Roma Muslims. The ban is also seen to reinforce divisions between the populations, divisions that already exist. While commenting on the ban, some of my respondents expressed their grievance at the life-long marginalization they as a minority, have suffered:

> "We try to teach the children. But they divide, they discriminate between Bulgarians and gypsies. They set them apart...The Bulgarians study in the city. Sometimes we argue. How can we have disputes about our children? You should know that I am Bulgarian, it was one class, two or three were from minorities, but we were all Bulgarian" (Participant 25, 50, Roma).

> They make us out as if we are dangerous, like we are animals who have to be tamed. Or shot. This is how it is" (Participant 30, Roma, 79).

Beneficiaries, victims, owners and actors

The humanists see no beneficiaries of the legislation, as the underlying assumption is that it is futile. The other stakeholders, however, are present in this perspective. The actors and owners of the transformation are lumped into a common 'they':

> "Well, I think the way in which they... work on burqas... it is violent, unfortunately, I must use that word. Well... they do not really try to persuade women not to wear burqas, on the contrary, they encourage them to wear the burqa" (Participant 16, 34, Turkish).

"Because they pull them up in the street. They fine them. They put them in the back of the car. And they fine our sisters, people from our religion. They fine them" (Participant 23, 42, Roma).

The victims of the ban are various – some define them as the women who wear the veil, others extend victimhood to a larger segment – be it the minority itself, or simply anyone who is "different". The following statements illustrate first-hand experience of victimhood, as they came from Roma women who cherish the veil:

"Well, yeah. Other people were fined, and many women hid, so I did too. I got very scared. I did not leave the house for three months. I sat here for three months. I was afraid. Well, at home, here, I cleaned, what can I say. I looked out the window. I didn't need the shop; I didn't need anything but the bed. Well… what can I say. Like this, my soul is free at home. Happy, I must say at first. But then I became very sad. But it's bad, isn't it? I cried. I don't know how I felt, I became ill. Ill. In bed for one month" (Participant 23, 42, Roma).

Another interesting respondent was Samia. While she did not consent to recording our discussion, she allowed me to take down written notes. Samia was 27-years old and I was introduced to her by Participant 23. They both lived in the Roma neighbourhood 'Iztok' in Pazardzhik. If you, the reader, find yourself in need of a refreshed memory, I would point you the introductory chapter of this thesis, where I revealed in more detail how and when this neighbourhood became infamous. Samia seemed distressed and said the ban is offensive to her and everyone in her neighbourhood. According to Samia, politicians are coming up with ways to harass them because they are a minority. Like Participant 23, she explained how her life changed for the better after converting to Islam and after putting on the veil. Samia said she wore her veil in the village, and flipped it up if there were police around, as people sent signals when a police car entered the neighbourhood. She said that she would never take off the headscarf. If they make her, she would leave the country. Alongside these ethnicity-specific feelings of victimization, there seemed to be a wider notion of victimhood experienced by Muslims, both from Bulgarian and foreign descent, as well as Roma:

"But now, mostly, the local Muslims, the Bulgarian Muslims, the Turks, if you will, our ethnicity is different, our citizenship is different. The place where you grew up and which you love is now different. They treat us all the same. When I go on buses, when I walk in the street, people think that I am a refugee. Or they speak to me in a different language. Or they insult me, thinking I do not understand. The moment I respond in Bulgarian, they are shocked, and they complement my Bulgarian. Of course, I was born here, I grew up here, I went to school here. Of course I speak Bulgarian, but they think I am a refugee. There were Muslims in Bulgaria before the refugees. They treat us all the same. That is not right" (Participant 16, 34, Turkish).

"Well… Often they say, they look at me sideways, they are discussing… on TV, they are showing… many people are speaking negatively. And the people who watch, they clearly get influenced like that" (Participant 28, 32 Turkish).

"Look, we live in a country where even if you have an English name, they will still call you a gypsy. You can be gypsy, but you still have a soul. It does not matter if you are Bulgarian or gypsy" (Participant 25, 50, Roma).

"Pazardzhik is 90% Muslim. Like me. The word Pazardzhik means pazar, a big market. That is the translated name of the place   . It was a big market back in the day. At the moment, it is mostly Muslim, and it is clear that they like that. And they support it. So, it must be a tradition" (Participant 12, 62, Roma).

Humanists who do not have personal experience with the veil express solidarity with the women who are persecuted. This is clear in the following statement by Participant 20 (his recording is not available, as per the respondent's request). Participant 20 thought that the veil should not be banned, and the "sisters" who were wearing it will be humiliated. He said he believes in God and is a practicing Muslim. He has heard of raids in Roma areas, predominantly where women wear it. He is concerned about police brutality against Muslims. He also supports the idea that the Roma are being funded by Muslim NGOs and missionaries who spread Islam and give handouts (money and clothes) to people. At the same time, he thinks it is a positive thing, as more people convert to Islam. His mother and sister wear headscarves (Participant 20, Pomak, 45).

Discussion of the BATWOVE analysis

In the course of my analysis, a few perspectives emerged. They were structured around ways of interpreting sacred and profane meanings, with the latter made dominant by the State through legislation. In placing themselves in relation to the ban, for and against, respondents drew on established beliefs and revealed the deep link between worldview and perception of the environment.

It also became apparent that the perspectives that emerged existed in opposition to one another: they could clearly be paired. The same phenomenon was interpreted differently; and thus, two oppositional coupled perspectives emerged. While the humanists are passionate about freedom, empowerment and shared dignity, paternalists placed a great emphasis on limiting freedom for the benefit of the affected people and wider society. Similarly, the securitists and anti-securitists were both interested in politics and security, but it had different meanings to them. While the former was invested in preserving the status-quo and national security, the latter was more concerned with education, food security and infrastructure.

The securitists held the most rigid perspective, which is also expressed in the ban – the ban's motives mostly talk of security and traditional Islam in Bulgaria. The source of rigidity is the lack of appreciation for the variety of stakeholders involved. An appreciation of the diversity of stakeholders is the first step towards analysing the effects of the ban. An interesting exploration of the boundaries of these perspectives and their characteristics would be to investigate how every camp relates to each other; such a reflection would inquire how every perspective views the other three (or whether there is even an awareness of one, two, three or more different perspectives on the ban).

With my current data, it is obvious to me that the securitists compare the Bulgarian Muslims, who wear the veil, to foreign extremist groups. This is the way the securitists portray the wearers of the veil as profane:

> "We will not do like Daesh. We say, we live in Bulgaria" (Participant 5, 55, Arab).

> "Here, they wear black. They think they are terrorists" (Participant 31, 34, Turkish).

On the other hand, the wearers of the veil feel the burden of public blame. Accounts of victimhood include:

> "it is just insulting, it is insulting... We are a minority. Nobody asks us what we want... Whatever happens, they blame us. It is like that" (Participant 26, 34, Roma).

> "They hate all of us, I told you. That is how it is with us" (Participant 23, 42, Roma).

> "We are not retarded, we are not some idiotic women, we are not foreigners. We are citizens, we work, we produce, we bear children – the future of Bulgaria – and we deserve respect" (Participant 27, 55, Turkish).

To the securitist notion that women in face-veils are more likely to be radicalised and to be extremists who terrorise society, one respondent rebutted:

> "We are women. I sell bras, not bombs... " (Participant 26, 34, Roma).

Another respondent expressed anger at the rest of society who are metaphorically asleep, ignorant of the processes that divide everyone into opposing camps:

> "People should wake up and see that we need to build this country together and we need to live together. Everyone is human, the ones with hijab, with niqab – we are human too" (Participant 27, 55, Turkish).

Additionally, both pro-bans and anti-bans accuse each other of making ill-informed choices. The lack of understanding that the opposing camps have for each other is causing tension, and every side accuses the other of being uninformed, stubborn and wrong. This is clear in the following statements:

> "First of all, this is not a burqa, what the people in Pazardzhik are wearing – this is called niqab or khimaar. The burqa has no window for the eyes. The niqab is when the eyes are open, sometimes the nose is open. They don't even know what to call this dress, and they are banning it! It is a disgrace" (Participant 27, 55, Turkish).

While the humanists support the idea of 'live and let others live', their position involves a closed logic too. The position of liberalism is often promoted as an overarching solution for conflicting ethical codes, however instead of a universal solution, liberalism itself is a pole in a debate (Midgley, 2004). The liberal option would be best for everyone, according to the humanists. But this is not the case for others who wish to impose their own views and ethical positions on others. Evidence for this tension that liberals experience under non-liberal pressure is evident in the following statements coming from the humanists and anti-securitists:

> "Those who are against it, they set others against it, the ones who are just watching TV, and they say, 'You have to take off the headscarf, to show your face, hair.' And I reply, 'After all, I am Bulgarian, I will wear what I want, I am not harming anyone. I don't speak to them, I don't make them join our religion, nothing…'" (Participant 28, 32 Turkish).

> "One of them said, she came, her child told her, right… We all know. I was very ill at home when I was hiding, very sad. Do you see me now? Look at me, I walk, just fine, but if you believe it, I was so sick. I don't know what it was exactly. But then I left the feredje and went out. Now I can manage everything" (Participant 23, 42, Roma).

> "Who are you to say if they're right or wrong? God is the judge. Who allowed you to judge? Those who claim they know the most, they know the least. Those that are all life-or-death. It means they know nothing. They have no brains. They're empty vessels, marionettes" (Participant 15, 36, Arab-Bulgarian).

Environmental constraints: emerging themes

Because I applied soft systems methodology retrospectively to the ready transcripts, I was able to identify different views on the ban as well as all of the four perspectives that emerged. The four perspectives are locked in a marginalization dynamic. So far so good. I felt that the environmental constraints element was rather important to my analysis as I have elaborated in earlier sections. As asserted, environmental constraints are factors beyond influence. Checkland consistently refers to environmental constraints as factors that should be taken as "given" (Checkland, 1981, p. 225; Checkland and Scholes, 1999, p. 35, p. 228). However, after performing my BATWOE analysis, I felt many issues

remained unaccounted for. These issues were primarily past experiences of my respondents, or in soft-systemic terms – elements of the environmental constraints as the past cannot be altered. Hence, I endeavoured to supplement my analysis with a catalogue of these themes.

The Revival Process

The face veil ban topic seemed to evoke different memories of past marginalization. Particularly prominent were the memories of the Revival process of the late 80s when many Muslim citizens were exiled to Turkey. Back in the 80s Muslims were given a choice – either to change their names to Bulgarian Christian names or to migrate to another country. The Muslims who had remained in Bulgaria had to undergo a mandatory name change and their documents only reflected Bulgarian Christian name while the Muslim name was erased. The details of the Revival process are extensively covered in Chapter Two. Links to the revival process were made by representatives of all perspectives including the ones who took the side of the State. Hence the ban itself irrelevant of its evaluation seemed to evoke negative memories of past marginalization. Interestingly, being victimised by the State once did not mean people were relating to other Muslims being legislated against now. Accounts for the Revival process from ban supporters include the following:

“We were Bulgarians who practice Islam. That is how we felt. Unfortunately, in the last years, since 1985, things got a lot sharper, they became politicised, unnecessarily, and in Bulgaria itself there was a confrontation. The government–the then-government–made a few unpopular moves, especially the expulsion of the Bulgarian Turks to Turkey, and this caused Bulgarians to view Turks with suspicion and vice versa. Even though, a large part of the Bulgarians, until then, until those provocations, Bulgarians and Turks lived together in peace. I have so many Bulgarian friends, I know that my friends, who are Bulgarian Turks, have lots of Bulgarian friends. So, the crisis back then was artificial, and it caused a lot of headaches for the whole country... I refer to the period between 1985 and 1989, when they changed the names of the Bulgarian Turks. That operation was violent, but it was also the result of the subversive acts carried out by neighbouring countries in Bulgaria. There were a couple of terrorist attacks, especially at Bunovo, where so-called Turkish nationalists had placed a bomb in train carriage full of mothers and their children, it blew up, people died. This infuriated the general populace, that terrorist attack, it set Bulgarians

against Turks, then there was the whole operation to change people's names, which later became... an operation to expel the Bulgarian Turks to Turkey. It was a circus. We had to leave our houses very quickly. This was instigated by local spiritual leaders, who were in the pay of various elements around the national security services, who were organising the whole persecution. Well... it was not pleasant, it was not pleasant, I would say it was horrible. We had to collect all our belongings, leave our homes, leave our houses behind, sell our property on the cheap. They say many people got rich. I came back at the first opportunity after 1989 and I was able to recover my house and some of my belongings. And I do not intend to leave Bulgaria ever again." (Participant 1, 67, Turkish).

"I know about the way they left. It was some kind of scandal. They left by train. It must have been hard. With my sister. My sister was five. They left because my father, he is not religious, but he is not going to change his name, right. So, he left, right. They said you either had to change your name or leave. And he preferred to leave. They sold everything. We are from a village, so we have a very big house. They sold everything in the house... They left. They could not settle down there. My father thinks differently from them. They found jobs, then people asked, 'how come his wife is working?'. No such thing. They could not sort it out there, they went to Istanbul, people started talking. They couldn't hack it, just a few months, my sister was young. So, they came back to Bulgaria." Participant 7, 27, Turkish)

"I don't want to remember or to tell you what happened to me then. I will just say it was horrible. The Revival process, that is where the Great Excursion came from, and then we saw how it is in the Republic of Turkey, who wore veils, I was in Eastern Anatolia, where women were covered and you could only see their hands. They were like ninjas around the bazaars. Yeah, a different way... even their views on religion, on... their lives, they were very different from ours, because we had lived under socialism." (Participant 4, 60, Pomak).

"That... Margarita. That came suddenly. It was not pleasant. I was already a teacher and I had to be very careful... My husband was a Party member. The principal asked me and another colleague to speak to the Turkish children, specifically. To calm them down, to tell them that nothing special had happened. Nothing tragic happened, but... It was a dense, unpleasant time. Sometimes, it feels like a dream, I cannot believe that it happened to me, I feel like it happened to somebody else. It is not very pleasant to talk about this." (Participant 2, 61, Turkish)

The Revival Process was also described by people who position themselves against the ban. Both pro-ban and anti-ban Muslims recalled painful episodes from the Revival Process:

"From Muslim names, they say—you are no longer Ayshe, you are now Annie. Just an example. And... taking away their identity, to me this is a direct removal of a person's identity. As I said earlier, I was a child back then, I did not understand too much, but I did not like it, I had one name at kindergarten and another at home that all my relatives and friends used. Except, like, the teachers at kindergarten. Well, we encountered that period. I was thinking that adults... for them, that wound will fester forever. Every time there is political turmoil, politicians speculate with this. Because some of those people are still living. And the soil is always infirm. But the reasonable people, they already know what the problem is, and they live in peace. That this must remain alive in history, that it should not be forgotten. Because many of the Muslims are aware that they were mistreated at that time" (Participant 16, Turkish, 34).

"After the Revival process, we began dividing ourselves a bit, into Bulgarians and Turks. They forced us to become Bulgarian then. We hid, eventually they found us and forced us to change our names. It was the truth, they forced us. We know many people who left, but then they came back... Some stayed. Those who had relatives and connections... Those who stayed there actually sorted out their lives, they live well. Those who had no connections or relatives... They came back later on. They had no chance. They could not get work or make any progress. But the State had taken some houses already. One man from my village came back he saw his house was gone, all furniture everything. He killed himself." (Participant 12, 62, Roma).

"It was horrible. Like turning a horse into a donkey, or a donkey into a horse. It cannot work. They forced us; I cannot explain how. They were all insisting, and we agreed, there was no wiggle room. People just made jokes with other students. Everyone was horrified by the prospect of having their name changed. It is like changing your name from a Bulgarian one to a Turkish one, it is not pleasant at all." (Participant 14, 46, Turkish).

"About what happened in Bulgaria. Todor Zhivkov had ordered that the names of the Muslims be changed. As a result, mass emigration started... To Turkey. Some changed their names; I do not know what happened exactly. I did not know about it, but their media reported that Muslims had been threatened by arms to change their names in Bulgaria. It was very unpleasant. I was still a Christian then." (Participant 22, 70, Bulgarian Muslim convert).

Personal episodes of marginalization

Many of my respondents recalled instances where they themselves were marginalized. Marginalization (in the systemic sense of assigning a profane status) had happened because of the person's difference – it could either be the colour of the skin or the religious difference. Whether these experiences were operationalized to support, contest the ban or whether they just came to the fore of my respondent's consciousness, I believe it is valuable to reflect on the fact that marginalization reminds people of times when they themselves were marginalized:

> "And I do not know why people take issue with my religion. I have never allowed myself to go to someone and ask, 'why are you so naked, why do you smoke, why do you drink', or whatever. I would never do it. I do not like interfering with people's lives. And it is very odd, I went on the bus and the conductor came and asked me about my whole life. Am I duty-bound to explain myself to everyone? People who do not know me come up to me and ask me about the headscarf. I try to be good to those people, not to alienate them, not to scare them away, so I am good, generally. But it is odd." (Lina, Arab-Bulgarian, 36).

> "I was just in a shop the other day and a child is pointing at me and asking his mother "Mummy, mummy is this a Gypsy". And the mother stares at me then she tells the child yes that is a Gypsy. Can you believe it? Instead of saying – it is not polite to point to people and shout, it is not polite to call people 'Gypsy'. She confirms and gives me a bad look... And when my son had an accident at work we drove him to the emergency room. Head bleeding and all, unconscious. Doctors told us to sit and wait, they accepted the Bulgarian. What is this – this is discrimination."(Participant 25, 50, Roma

> "A Bulgarian woman said: 'I am a Christian; you are a Muslim. 'I told her–'The Bulgarian people go to Egypt'. She said, yes. 'You go to the beach. What do you do?'-We undress. And what kind of country is it? Muslim. She said yes. 'Did they stop you?'-No. 'Then?'" [Participant 5 told me about an incident that happened two days ago where a customer verbally attacked Participant 5's wife for wearing a hijab bin a Christian country]. (Participant 5, 55, Arab).

Particularly interesting was the account of Participant 7, a 27-year old lady of Turkish ethnicity. She had been in a relationship with a foreign student from Turkey. In his family, women covered their faces. According to her, it was the difference between her secular outlook on life and his religious upbringing that led to the collapse of the relationship as his family arranged a marriage for him that he agreed to even though he had been engaged to Participant 7:

"To me, the veil is a restriction. It is not a way of thinking, because it is not mandatory. I had a relationship, though, for six years, we had a relationship, and this tore us apart. Because I was not covered up. That was the biggest issues. And I was sure, nobody can tell you to do something if you do not want to. Unfortunately, in Turkey, it is like that—once you are 14, after your, like, first menstruation, you are bound to cover up. To me, this is not normal. I do not mind them. It is a huge restriction. You can't be seen. It doesn't matter if you are covered up or not, it's all in their brain." (Participant 7, 27, Turkish)

Anti-Roma sentiments

Another recurring theme in my conversations were the explicit anti-Roma sentiments. As expected, many ban supporters (how many) also expressed negative attitudes towards the Bulgarian Roma. I initially expected only people who support the ban to express anti-Roma sentiments. However, to my surprise, people who were anti-ban were also anti-Roma.

Freedom is good, but... There are now grannies who get raped, robbed. That is not a good thing. The lawless gypsies, the gypsies do this. There are no laws for them." (Participant 21, 60, Gagauz).

"In fact, the gypsies are wearing it because people are sending them money. The Saudis are sending them money as they9 gypsies) live in ghettos and the Saudis think they are doing charity. Yes, the gypsies turn to the money. The only thing that motivates them is money. This is my impression. They wear it for the Saudi alms and the politicians are using this whole thing to create a storm and to scare rest of the population. This ban is like a mutual craziness. One side is the state, the other is the ghetto – like in Pazardzhik there is a country within the country, and this feeds a fire of hatred. This is very dangerous because people get easily fooled into hating the state, especially those poor gypsies can easily get radicalized." (Participant 27, 55, Turkish)

"They are corrupt and getting paid 100%. How they get paid to vote, to kill, to steal. Now there are NGOs giving them money to pray. I know because in my village one of the girls is married in Pazardzhik to a Turkish guy. She told mee all about it. The whole city is talking and yet—nobody enters the Gypsy areas". (Participant 29, 33, Gagauz)

"Well, I think that they live in poverty. The vast majority of them do. It is clear to me that these groups are vulnerable. They attract preachers of all creeds. And I think that... if some sum was offered, some aid, or some acquisition, I think they might have become members of the religious community because of that. Without thinking too much. Just like they used

to be Christians with Bulgarian names. If I recall correctly, one of the main actors was on trial, he used to be an evangelist before he became Muslim. I think it was like that." (Participant 2, 61, Turkish)

Conclusion

In this chapter, I have endeavoured to write down my systemic reflections on the conversations I had with Muslim respondents in 2017. Upon my analysis, I discovered that there are two large opposing camps – the ones who condone the intervention and the ones who oppose it. I called these camps pro-bans and anti-bans. Overall, within them, there were sub-perspectives that were characterized, not by differences in the moral justifications for their positions, but by the primary focus of concern. For example, all pro-ban people are sympathetic to the State and are concerned with national security, the usual traditional manner of expressing Bulgarian identity, and the liberty of the citizens to maintain the lifestyle they have had until now.

However, securitists as a sub-group are mostly concerned with securing traditional norms of behaviour, while paternalists concentrate upon personal freedom, more particularly the freedom of women. Similarly, anti-pro-bans also shape their perspective because of the state, but instead of expressing support for it, they express disrespect and disappointment in the State. The two sub-perspectives that I identified had mirrored concerns to the securitists and paternalists – while anti-securitists contested the threat of terrorism and the measures taken against it, they admitted that other security concerns are at hand: e.g., labour rights, economic security, infrastructure, crime. In a similar vein, humanists were primarily concerned with human freedom and the freedom of Muslim women to wear the face-veil as an expression of their identity. The perspectives, as reflected in Figure 7.2, present mirroring opposed camps that are organized around the same concerns, albeit differently interpreted. Pro-bans see security as under attack from an external threat, so they align themselves with a strategy to protect the internal status quo from foreign malignant influences. Anti-bans claim that even though such a threat exists in the wider world, it is not specific to Bulgaria, which does not

have a problem with radicalization, yet has other serious issues that need to be tackled.

Since these interpretations are mirrored, it could well be assumed that both perspectives exist in relation to each other, and they are defined by their differences. However, a closer look illuminates that pro-bans do not make references to anti-bans – perhaps they are not even aware that anti-bans exist. What pro-bans unite against is the veil and the ones who wear it. These respondents, as elaborated earlier, are hosted within the humanist perspective.

However, anti-bans interpret pro-bans as profane because, they say, the pro-bans are easily led on by politicians who plot to recruit supporters, or simply because they are Islamophobic. It is obvious to me that anti-bans were not visible to the pro-bans I interviewed. Thus, there are two one-sided marginalization processes – pro-bans marginalize face-veil wearers, and anti-bans try to marginalize pro-bans in return. Thus, there is no direct interaction between the two camps, and while the anti-bans only exist because of pro-bans, the latter shows no awareness of the existence of the former. These relationships, and the potential strategies to overcome them, will be discussed in the final Chapter Nine. What became apparent though, is that strong framing of issues as sacred or profane in legislation, does affect how people feel about themselves and how they relate to each other.

Chapter 8 : The rules we live by

The previous chapter identified four perspectives that emerged from my data. These four perspectives are connected in a marginalization dynamic. They themselves, and the dynamics between them, were generated by an intervention (albeit with a historical path-dependency) banning the face veil. A ban on identity expression is, of course, a legal act in a systemic context. Thus, a reflection on the relationship between marginalization and legislation is needed. Moreover, my respondents demonstrated the central place of environmental constraints (as discussed by Checkland, 1981) to their evaluation of the ban. It was apparent that environmental constraints (i.e., those factors that are taken as given and unalterable by people) are not limited to social group and collective morality, but also include formal institutions and legislation. This chapter aims to move the identity debate beyond the micro-level of social groups by reviewing the relative place of the individual in a social system where the State has the legitimacy to reinforce some moral interpretations and simultaneously undermine others via use of the law. The study of law is commonly called 'jurisprudence'.

The most prominent systemic jurisprudential theory is that of self-referential social systems, or institutions (Luhmann, 1986, 1988a, 1988b). Self-referential institutions are numerous: political, economic, religious, scientific, educational and legal (Luhmann, 1986). They are all sub-systems of the wider social system, and are formed of communications, and *only* communications (the agents who are communicating are viewed as being in the environment of the system). Every institutional sub-system of society is self-producing (autopoietic) because, in reproducing itself through operational cycles, it creates new judgemental communications, referring both to its fundamental code, which constitutes a binary opposition (such as legal-illegal), and past precedent (Luhmann, 1986, 1988, 2004). If the code is integral to the system, and so are the communications that make up the statements of past precedent, then there is nothing from outside the system that is employed in the creation of the new communications that are to become the new parts of that system. Hence, in Luhmann's (1986) view,

contemporary societal institutions (including the legal system) are fully autopoietic.

Luhmann's theory remains enigmatic to many, perhaps because it presents what they see as an abstract account of autopoietic social systems, although, in my view, Luhmann's (1986) book, *Ecological Communication*, illustrates the theory with many useful examples. Although I appreciate its importance to understanding the general functioning of institutional systems, I argue that Luhmann's theory is problematic in one important respect: putting human communicators in the environment of the system seems to me to be a counter-intuitive move that disconnects institutional systems from the human agents that constitute them (Dupuy, 1988; Rottleuthner, 1988; Mingers, 2002, 2004). Although Luhmann (1988a, 1988b) elaborates his choice of placing human beings outside the system, and he explains that institutions could not be autopoietic if people are viewed as parts of institutions, because they bring in knowledge from outside those institutions, I argue that this position is not consistent with the systemic theory of identity that I am working on, as it is about embodied people and their interactions, and not just their disembodied communications.

In this chapter, I aim to remedy the disconnect between institutional communications and the people who produce them by bringing in the human experience of legislation against the backdrop of identity. Finally, I intend to argue that the discipline of anthropology has plenty to offer in terms of systemic enquiries into identity and its regulation. Because the State tends to moralise social issues, especially those that are potentially dangerous, I have selected Douglas's (1991) theory of risk as well as her general cogitations on institutional design and the interactions between individuals and the State (Douglas 1966, 1970). The early ideas of Douglas (1966) have informed the systemic theory of marginalization (Midgley 1992, 2000, 2015). I believe that her later works (Douglas, 1966, 1970, 1986, 1991) can *enhance* this marginalization theory by situating marginalization processes in an institutional context.

The remainder of this chapter is structured as follows. First, I will turn my attention to Luhmann's (1988) theory of self-referential social systems – and more

particularly, his cogitations on the legal system. I will present his main arguments in more detail than the sketch I have already offered and will contest the separation between communicator and communication. Furthermore, I will present Douglas's views on institutional design, framing of risk and techniques for exclusion and control. Her valuable insights on culture (Douglas, 1970, 1986) will serve to extend the theory of marginalization (Midgley, 1992, 2000, 2015) beyond binaries and into spectra. Finally, I will offer some concluding comments, and will propose a new way of thinking about the marginalization of social groups in the presence of a legal intervention.

Rules and belonging

One can hardly begin to theorise any level of organisation without two basic elements – rules and belonging. While the rules provide the basic principles with which the organisation is defined, the element of belonging clarifies who and what is 'in' and 'out', and which people should be aware of (or wary of!) the rules. In the case of national legislation, all people who live within the borders of the State would be considered as potentially affected by the legislation when it is broad, like penal and public law. At the same time, some specific laws cover the rules of behaviour of regulated professions, like lawyers, medical doctors, teachers, and so on. In this case, legislation is specific, and it only targets the behaviour of a certain group. However, legislation that regulates social behaviour, like the anti-face veiling act in Bulgaria, is framed as valid for all members of society, although it clearly only affects women who cover their face for religious reasons (people who have health conditions are not covered by the ban).

Almost every person in the world belongs to a State (with the exception of a few places where tribal people are isolated from wider society, and others where legitimacy is contested, e.g. war zones and disputed areas like the Gaza strip). Since Bulgaria has no isolated tribes and is not disputed as a country, its claim to territorial legitimacy is uncontested. Thus, general legislation in Bulgaria (of penal, administrative, etc., character) is widely accepted as valid for all its citizens. The legal chapter of the thesis discussed in greater detail the hierarchy of Bulgarian

legislation, as well as the steps of the legislative procedure. Similarly, the chapter on identity reviewed different approaches to studying identity, both individualist and communitarian. However, to gain insights into identity processes stemming from a State-led legal intervention, one must look at jurisprudential scholarship. Similarly, to understand the processes behind the design of rules (formal and informal), one should consult anthropology. As stated in the introduction to this chapter, to fulfil these two tasks, I intend to present the work of Luhmann (1988, 2004) and Douglas (1970,1986,1992) to advance my systemic inquiry into identity.

Legal theory: Self-referential systems

Modern legal theory is concerned with the relations between rules and language, legal uncertainty, and the source of the authority of law. In Britain, HLA Hart's brand of legal positivism (Hart, 1961) remains the *fons et origo* of mainstream jurisprudence. In Hart's legal philosophy, the law derives its authority from sociological facts, but its internal operation, which includes all adjudication in society, is always a matter of formal logic. According to Hart, every rule has a core and a periphery – or a penumbra of uncertainty. The core contains clear rules and prohibitions, while the penumbra leaves space for the judiciary to analyse and make a value judgement. For instance, covering the mouth, ears and nose is prohibited in Bulgaria. Suppose a person walks in stormy weather with their scarf blown over their face. Then the covering of the face would be in the penumbra or the periphery of the rule, as they were not able to uncover due to the strong wind that caused their face to become veiled. Under Hartian positivism, once an act is in the penumbra, the judiciary enjoys a degree of discretion when applying legislation.

Hartian positivism is rivalled in prominence only by Dworkinian interpretivism. Dworkin's theory posits that all disputes have a unique, correct resolution and that there is always a rule available that can be interpreted (Dworkin, 1986). The judiciary do not enjoy any discretion, even when a dispute is penumbral. In fact, disputes are never truly penumbral. They only *appear* uncertain because of the judiciary's failure to identify the politico-moral core of the law. Additionally, there

is always a rule out there that can come to aid the judge in their decision. For instance, plenty of civil legislation relies on the institute of force major – where unforeseen circumstances and natural disasters are factored into regulation. Thus, upon closer review, the judiciary would be able to identify a rule that can be applied to the situation, as all legal events happen within the 'core' of some sort of legislation, as a penumbra or a periphery simply does not exist (Dworkin, 1986).

These theories are intended to explain all law, irrespective of content – a fascist regime and a platonic republic can both be analysed along positivist or interpretivist lines. This is not to deny the existence of normative theories of law, such as critical legal studies (Kennedy, 1997) and law-and-economics (Posner, 1973). However, their impact on legal practice has been limited, especially in Europe.

It was in this context that Luhmann introduced his systems theory of institutions, with a special focus on law, and his work unfolds along similar lines to both positivism and interpretivism: his concern is to provide a generic theory of legal structure, and he is not interested in the implications of law for identity or the consequences for human behaviour (both matter for my thesis). To reflect on the systemics of law and identity, one needs to utilise a *systems theory of jurisprudence.* While Luhmann (1988, 2004) is arguably the most significant contributor in the field of systemic jurisprudence, as we shall see below, his theory does not engage with human factors in legislative processes, so a revision of these systemic ideas of jurisprudence are needed in order to account for the role of the legal system in identity production.

Luhmann (2004) advances several claims regarding the superiority of a systems approach in approaching matters of legal scholarship. According to him, the central argument in systems thinking is the conceptualisation of 'system' and 'environment', while the inclusion of the observer is also among the fundamental concepts (in addition, see classic writings in second order cybernetics, such as von Foerster, 1979; von Glasersfeld, 1985 and Maturana, 1988). Luhmann speaks of the 'observing system', or how systems use self-produced observations, and claims that no other theory but a systems theory could deal with the complexity of the legal realm. Inspired by the ideas of Varela et al. (1974), Luhmann (1986) adapts the biological theory of autopoiesis (reviewed in more detail in Chapter 6) and

transplants it to the field of social science. An autopoietic system was first defined by Varela et al. (1974) as a living system that reproduces its own elements through the interaction between those elements and the environment. To put it in their exact words:

> "[t]he autopoietic organization is defined as a unity by a network of productions of components which (i) participate recursively in the same network of productions of components which produced these components, and (ii) realize the network of productions as a unity in the space in which the components exist" Varela et al. (1974, p. 187)

Thus, Luhmann's theory of self-referential systems hinges upon *self-reproduction* or *social* autopoiesis. The legal, economic, political, scientific, religious and education systems are all autopoietic subsystems of society (Luhmann, 1986). In a nutshell, the elements of a biological system (organism) are cells, tissues and organs, and its environment is everything that spans beyond its external boundary (for example, the skin of the human body constitutes its external boundary). Biological systems co-exist with their environment and constantly produce themselves in relation to the environment, thus performing autopoiesis. Literally translated, autopoiesis means 'self-poetry', although it is more commonly defined as 'self-producing' (Mingers, 1995).

In Luhmann's (1986,1988, 2004) *social* autopoiesis, the elements of a social system are communications, while human beings and other biological and physical elements, like nature and man-made objects, are within the environment of the system. Moreover, social systems are self-referential, not just in their process of production, but they also refer to themselves as part of this process (i.e., in the case of the legal system, previous legal communications that have established precedence). Biologically, in order to manage complexity, organisms have to become closed to their niche, meaning that they need to be autonomous and also maintain a protective boundary, by fencing the environment out. Rather than having direct relationships with their environments, organisms operate with a limited scope of responses and receive a limited amount of information from the environment (Maturana and Varela, 1987). Upon receiving that limited information, organisms process it and then produce complex reactions that feed back into the environment (ibid).

In Luhmann's (1988a, 2004) theory, the elements in social systems are *communications*, while the elements in biological systems are biochemical subsystems, such as cells and organs. However, in relation to their environment, social systems operate in the same way as biological ones – by limiting the information that reaches them and then issuing a response that comes from a catalogue of possible responses. Information, to Luhmann, is exclusively internally, selected by a given system's selection horizon. The selection horizon is informed by the very same binary that holds the system together. Thus, only information that can be classified using the binary code is accounted for. In the case of the institution of law, the binary code concerns whether something is legal or illegal. 'Accounting for information' means that the communication is viewed as *part of* the institutional system. Thus, a communication about whether a particular example of face-veiling is legal in Bulgaria will be accepted as part of the system, but one about whether it is appropriate to the Islamic faith will not be (the latter does not involve the consideration of legality). Luhmann (1988a) explains that only those communications that resonate with the fundamental binary of a system can be accepted as parts of the system. While every system operates within an environment, he states that social systems, as systems of communication, cannot *directly* access their environment (they have no option but to *interpret* communications in terms of the binary and past precedent), so they exist within a niche that is operationally inaccessible to them. An analogy can be drawn between this and biological human beings, as the latter cannot access communications 'as the speaker intended', but only as their interpretive framework (which is dependent on past experience) allows them to be understood.

Every system has a single code, on whose axle programming turns. Codes are always rooted in oppositional binaries, like "legal-illegal" (Luhmann, 2004, p. 174). One side of the code is positive ("legal") and the other is negative ("illegal"). Every code has only two sides. The reason for institutions to exist is to enable the efficient processing of decisions while allowing multiple possible responses rather than causal (single) responses. Thus, decision-making happens through the interpretation of these binary codes. In jurisprudence, codes correspond to rules. Finally, the autopoiesis of institutions gives them a resilience against the

communications of individuals when those communications do not resonate with the system.

More precisely, self-referential systems are "systems which themselves produce as unity everything which they use as unity" (Luhmann, 1988a, p.14). The system has its own fundamental "code" where right and wrong are defined. Thus, through its closure, it reproduces itself in its own image, where this code is upheld. However, the code alone is insufficient: there is also a second dimension – the interpretation of the code in light of precedence. The social system and all of its sub-systems consist of nothing but communications. Social systems reproduce themselves only through self-referential communication (Luhmann, 1986). Hence, social systems reproduce themselves through their understanding of themselves by way of analysing and receiving communication. Logically, if reproduction flows from communication between a past, present and future state, reproducing relies on self-observation or self-description of the system and the following action of reproduction.

Critiques of Luhmann

The very idea that autopoiesis may happen beyond biology, in the social realm of communications, is critiqued by several scholars. For example, Varela (1979) asserts that autopoiesis can only be observed at the level of the individual biological organism, and hence social systems cannot be autopoietic. A system can only exist within an environment, and the environment facilitates the process of autopoiesis. Luhmann's reply is that the institution of law is made up of communications, and it exists in the environment of *wider* communications, plus the physical beings doing the communicating. In the legal system, communication consists of information and comprehension (Luhmann, 1988b), so the elements (parts) of the system, communications, are different from the elements of a biological organism, but autopoiesis is still possible. Autopoiesis envisions reproduction where the unity maintains its identity (Maturana and Varela, 1987), and in this sense the institution of law can be subject to either radical or incremental change without the autopoietic character of law being infringed upon (Luhmann, 2004).

Rottleuthner (1988) and Mingers (2002) believe that once communication and agent come to be separated, then the complex relationship between people and the communicative system they use is concealed. Rottleuthner (1988) also critiques Luhmann's (1988a) level of abstraction on the grounds that it is so different from the rest of legal research that there is no point of engagement between them. Dupuy (1988) likewise argues against the wisdom of separating the communicator from his or her communications. The entirety of society, with its human beings and emerging patterns of behaviour and communication, is what facilitates the autonomy of the social system (Dupuy, 1988), and the abstraction of communication into a separate domain makes little sense without its generating agents. Luhmann's reply (1988b) is that the abstraction of communication is important to his theory, as biological beings can move between institutions. This means, if they are seen as parts of those institutions, it makes autopoiesis impossible as there is no longer operational closure. From a scientific point of view, this stance is open to criticism as it is equivalent to treating the theory of autopoiesis as an ideology, such that any question that can be raised against it must be illegitimate simply because it threatens the theory (Midgley, 2020).

Midgley (2009) suggests that *institutions host organisations*. Every institutional system has a single binary code, and it also has many other communications that have been accepted in the past as part of the institution because they have resonated with the binary (in this respect, Midgley, 2009, follows Luhmann, 1986). Organisations, however, consist of two things: complex rules and policies, grounded in the institutional code; and human beings who interpret the code and adapt their behaviour according to it, as well as according to their own values.

Thus, rather than being autopoietic, institutions provide 'strong framing'. They stop short of full autopoiesis because embodied human beings are involved; and, as Luhmann (1988a, 1988b) rightly says, if physical human beings are viewed as part of the system, then autopoiesis is impossible because people carry understandings with them that have their origins externally. Moreover, since it is human beings who interpret the code, and they can move between institutions (and also between organisations), several competing strong institutional framings

may be at play. Grace et al (2011) provide a clear example: when forensic DNA evidence is communicated in court, it needs to resonate with both the institution of science (which gives it scientific legitimacy) and the institution of law (which enables it to have utility in building a picture of what happened in a criminal case).

Indeed, Grace et al show that different stakeholders in these two institutions interpret the same communication of DNA evidence very differently: forensic scientists view the evidence as a statement of statistical likelihood of the origins of the DNA sample, and not a statement about the identity of the offender, while the prosecution lawyers and police jump straight to the question of identity. In Grace et al's (2011) interviews, both the scientists and legal professionals expressed a great deal of frustration about each other's interpretations (the scientists saw the lawyers as jumping to conclusions that are not strictly warranted by the evidence, and the lawyers saw the scientists as stopping short of the identification of the offender that they need). Grace et al (2011) argue that communications of DNA evidence are worded very precisely to allow *both interpretations to co-exist*, as if either of them was undermined it would threaten the legitimacy or the utility of that evidence.

My research is situated within the social and legal systems, and I have turned my theoretical attention to the human agents who receive these communications. While my focus is on the personal awareness of identity and the organisation of identities within a social system, reflections on the character of this system are essential. In my theory building, I have chosen to set aside Luhmann's theory (1988a, 1988b, 2004). My rational is as follows. The theoretical pluralism that is advocated in a systemic intervention approach (Midgley, 2000) entails making choices between theories, and such choices should be informed by the purposes of the researcher (Midgley, 2011). Midgley (2011) argues that, when these purposes involve treating other people's theories as sources of insight or inspiration to inform an intervention, but the focus is solely on the development of methods and their application rather than theory-building, then the fact that those theories might make contradictory assumptions doesn't necessarily matter. However, if the purpose of the research is actually to build a new theory, drawing on insights from existing ones, then the reconciliation or avoidance of incompatible assumptions

does matter. For instance, it would not be acceptable to propose a theory that assumes (a) that embodied human beings and their perspectives are parts of institutions, yet also says that (b) institutions are composed only of disembodied communications. I would be introducing precisely this contradiction if I were to use Luhmann's theory, as I am interested in looking at the identity-forming effects of legislation *on individuals* (the very individuals who Luhmann, 1986, puts in the environment of the legal system).

Cultural theory and risk

The study of human organisation is distributed among several disciplines: sociology, anthropology, politics, organisational behaviour, psychology and social psychology – plus numerous other niche branches of the social sciences. In my view, anthropology contains the most valuable insights on human organisation that are congruent with systems thinking. Anthropology studies systemic patterns of organisation at different levels – e.g., family unit, social group, tribe and State (Hénaff, 1998). At all these levels, rules and expectations governing social behaviour are identified. It is the unveiling of higher-level systemic patterns or forms of organisation that is really useful for my project, and this is consistent with both my purpose (looking at the identity-forming effects of legislation on individuals) *and* the way that Midgley's (2000, 2011) systemic intervention methodology treats theory.

Arguably, one of the most important anthropologists writing in the 20th Century was Mary Douglas. The consistency between the cogitations of Douglas (1966) and systemic intervention transpire from the fact that Midgley's marginalization theory was inspired by Douglas's seminal work, *Purity and Danger.* Douglas (1966, 1986), like Luhmann (1986, 1988a, 1988b), asserts that societies generally construct their institutions on binary definitions. In Douglas (1966), the fundamental oppositional binary is the sacred and profane, and she refers to other binary opposites in her explanation of the foundational logic of institutions (Douglas, 1986). An 'institution' here is a formal and/or informal set of rules that

prescribes behaviour; or simply, a guide to how things are done (Douglas, 1986). However, beyond just defining what an institution is, she focuses much more on explaining the different systemic pressures involved in the process of establishing and reproducing social institutions. Her earlier work relies on Levy-Strauss (1958) and Durkheim (1915), who both assume binary codes. In Durkheimian (1915) terms, religion rests upon the sacred and profane dichotomy – where sacred means supernatural, and profane indicates the ordinary. Levi-Strauss (1958) claims that binary oppositions are fundamental to narratives in the media that prompt sense-making, the reinforcement of stereotypes and the cementing of ideas through contrast. It was therefore only natural that Douglas (1966), following in the new tradition of structuralism that Levi-Strauss founded in the discipline of anthropology, would offer her contribution to the growing number of theories of binary oppositions. In her later work, Douglas (1986) did not abandon the idea of binary opposites but moved on to explore the complex social processes where these opposites come into being.

Symbols, rituals and value patterns

An inherent part of the social process is communication. Douglas (1970, p. 40) affirms that human communication is inherently symbolic:

> "Symbols are the only means for communications. They are the only means of expressing value; the main instrument of thought, the only regulators of experience. For any communication to take place, the symbols must be structured. For communication about religion to take place, the structure of the symbols must be able to express something relevant to the social order".

One of the great problems of modernity, she continues, is the lack of a commitment to maintaining a common set of symbols. Indeed, there is also evidently a lack of agreement on what symbols represent. The diversity of opinions on the practice of face veiling that I encountered during my research convinced me that there is no consensus on what it means and how it should be regulated. There are plenty of

examples where symbols of value patterns are deemed profane and/or illegal. The face veil in Bulgaria is but one.

Douglas (1970) raises concerns about the withdrawal from ritual in modern societies. She defines ritual as a form of a restricted code, only known to a limited number of people. Any structured group where members interact closely develops a special form of coded communication (Bernstein, 1964). Douglas (1970, p.57) considers much of our administrative behaviour as a "restricted code". Douglas (1970) shifts the lexeme 'ritual' away from the sanctity of religion and into the secularity of organisations. Thus, the term 'ritual' signifies both religious and secular restricted codes. According to Douglas (1970), there has been a withdrawal first from religious ritual and then, more recently, from secular ritual as well. She warns that, when we reject ritualised speech (expressions), we enter an unstructured intimacy in our social relations, where wordless communication becomes impossible. Only a ritual structure facilitates a nonverbal channel of communication.

However, legislation against ritual expression does not inherently reject all symbolic communication. Such legislation rejects a *specific* symbolic expression, like the face veil. Symbols are synecdoches of wider value patterns. If the pattern is religious, then muting its expression prevents the ones who have turned to religion from negotiating their own identities (Douglas, 1970). The choice of the word 'negotiating' is deliberate in this context, as it suggests an active engagement on the part of the individual rather than a passive receipt of an identity ascription (Midgley and Ochoa-Arias, 2001; Midgley et al, 2007; Midgley, 2020).

Value patterns

Whatever it may be – social, religious or secular – the ritual facilitates the enforcement of a given pattern of values, and the code it embodies (see below) also enables group members to internalise the set pattern of values, the structure of the group and its norms. The ritual as a restricted code is the way a value pattern is implemented. In this sense, Douglas's (1970) code differs significantly from that of Luhmann (1988a, 1988b, 2004), where the code contains the oppositional

binary of sense-making. What Luhmann (2004) calls 'programming' is the code of Douglas (1970). Similarly, the value pattern in Douglas (1970) is the code of Luhmann (1988a, 1988b, 2004), although Douglas does not limit the pattern to an oppositional couple.

At State level, the pattern of values is usually officially prescribed in a Constitution or other legislative acts. Interestingly, in the motives attached to the ban, there were explicit concerns of foreign moral influence. In the language of self-referential systems (Luhmann, 1988a, 1988b, 2004), the legal system was making references to itself and its fundamental principles in relation to the face veil. Face veiling was communicated as incongruent with democratic values, the equality of the sexes and general civic freedoms upheld by the Bulgarian State. The issue with self-referential systems is that powerful actors can interpret events through systemic codes to serve their interests. For instance, the Bulgarian Constitution proclaims Christianity as the official State religion, but it also ensures freedom of thought and religious beliefs. The debate on the burqa included a strong reference to the official State religion. Thus, the campaign to ban the face-veil in Bulgaria relied on a binary opposition with the Muslim value pattern that is officially encoded in other countries. Examples of this are the following statements made by key influential figures in the debate:

"With all due respect, this is not traditional Islam. I am of the opinion that in public spaces one should not wear a burqa. We should not underestimate what is happening in the Roma enclaves in Pazardzhik. Belgium had similar practices a while ago, and everybody knows what it has come to now. This is a sensitive topic. One should be careful not to violate religious freedom, but at the same time we should not allow religious motives to aid propaganda and radicalisation" – Chief Prosecutor (news.bg, 2016).

"I believe that, as a society, we are tolerant and open enough. However, we carefully consider what actions should be taken to ensure we have a safe and inclusive society" – Meglena Kuneva, Minister of Education (dnes.bg, 2016).

"This is political Islam. To many Islamists there is no difference between religion and State. Such is the situation in Saudi Arabia – the State follows religious codes" – Alexander Alexiev, Director of the Balkan and Black Sea Research Centre (btvnovinite.bg, 2016).

In this sense, not only the symbolic expression was under attack, but also the wider value pattern it belonged to. This attack involved both the marginalization of the veiled women themselves, and marginalization of the value system they subscribed to. Sometimes legislation targets social rituals without explicitly condemning wider value patterns. However, this does not mean that the value pattern is not marginalized. A good example can be found in the motives attached to the bill that preceded the face-veiling ban. Stark statements such as "radical violent ideology" and "alien Islamic forms" constituted the argumentation behind the ban. However, the text of the legislation itself (expanded in greater detail in the Legal chapter) omits references to any spiritual practice.

Legislation against the burqa is not just against the ritual expression of a set of values though. Such legislation also deals with the human body and its place in society. The human body is the *emblem* of society (Douglas, 1970). Thus, expectations of the body, such as grooming, hygiene and particular movements, are restricted by social pressures. These social pressures are unique to a given value system. In other words, the boundaries of the body and the boundaries of our behaviour are interpreted by powerful social actors entrusted with maintaining the code of the value pattern. Depending on the scale of the group, agents of power may be community leaders, police officers, teachers or parents. Indeed, a bricolage army of agents maintain boundary interpretations in a variety of ways.

The pattern of values is not unanimous though. Indeed, if it were, there would be no perceived need for legal regulation. There is a diversity of patterns (in the anthropological ritualistic sense described above) that carry the quintessential binaries of social groups. The face-veil covers the body of a woman, and its reception, enforcement or prohibition is very telling of the core values upheld by any structured social system. However, maintaining the value pattern, Douglas argues, is more important to tribal than to modern societies: "But in primitive culture, the rule of patterning works with greater force and more total comprehensiveness. With the moderns, it applies to disjointed, separate areas of existence" (Douglas, 1966, p 41).

I disagree with Douglas here concerning the force and ubiquity of ritual expressions of value systems in modern society, but nevertheless, the growing body of legislation that the so-called modern world has produced to maintain its patterns is by no means comparable to the sets of rules that tribal communities used to live by. A good piece of evidence for this is my personal experience as a law graduate. During my legal studies, I lived in the same building as a retired lawyer. My neighbour was surprised to find out that, at the time of my study in the mid-2000s, the duration of the law degree was seven years, while in her time it had been three. Having graduated with her LLM in the sixties, my neighbour had worked through the seventies and eighties, and had retired in the nineties. She was convinced that the increased length of the law degree was due to the rise of different types of new legislation that accompanied the country's economic and technological development.

Luhmann (1988a) discusses negative attitudes towards the amount of legislation available in Western societies, and he critiques its growing complexity (Luhmann, 2004). All new developments that are of social and political significance must be legislated – paternity leave, cybercrime, surrogacy and data protection, to name just a few.

The social system must be structured according to the values upheld by the State. Thus, a ban on the public wearing of the veil, or a ban on public smoking or public drinking, all allude to the pattern of values that the State deems should be dominant. Because we live in a capitalist democracy, and governments change when mandates expire, some of these changes are informed by the values of one party or coalition government and its successor either continues working in this direction, moves away from or even retracts the social change. However, rules that are institutionalised in legislation are harder to amend than rules that do not have legislation backing their formulation. This is because legalised rules follow a strict systematic process and are hard to initiate and see through.

Institutional theory

One could suppose that different parties have differing priorities and interests in maintaining previous political projects and programmes. For example, the centre-right political party in Bulgaria, GERB, maintains that infrastructural projects have primacy. For the centre-left Socialist Party, agricultural projects take precedent. Different types of institutions inform different ways of thinking (Douglas, 1970). An institution is a social convention that has gained legitimacy. For example, from the perspective of the centre-right in Bulgaria, roads and railways are means to unleash foreign direct investment. This view comes from the established convention that Bulgaria needs foreign investors to develop its nascent market economy. The need for foreign investment is an established social convention for centre-right leaders and voters, and as such, it is institutionalised. Douglas (1970) even goes on to argue that it is institutions that provide enabling constraints (or boundaries, in Midgley's, 2016, language of systems thinking) for sense-making, as well as repositories of meaning that help us navigate our experience of the world.

 The binaries in institutions are rooted in some sort of naturalistic analogy, such as' 'male-female', 'life-death', 'weak-strong' and so on. Institutions are the product of human organisation and its structure, but they are not agents, even though they enable and constrain human action, expression and communication. Institutions cannot think or feel, which is Douglas's (1970) answer to the communitarian question about whether a social group can feel something. When the foundational analogy of an institution matches an existing structure, such as an established power dynamic or order of precedence, then the social pattern cements its logical justification. A close match with power or precedence gives an analogy prominence, and legitimacy to the institution associated with it. For example, a competitive society admires its heroes, a sect cherishes its martyrs, and a hierarchy worships its chiefs. Classifications are incorporated in institutions. Moreover, institutions inform boundary judgements; what issues are to be included or excluded and considered primary or secondary:

"Institutions create shadowed places, in which nothing can be seen, and no questions asked. They make other areas show finely discriminated detail, which is closely scrutinised and ordered" (Douglas, 1970, p 69).

The boundary idea is central to the project of systems thinking (Ulrich, 1983; Midgley et al, 1998; Midgley, 2000). It is impossible for any analytical inquiry to achieve comprehensiveness. However, by appraising different boundary judgments, issues can be analysed from different perspectives. In the paradigm of systemic intervention, performing boundary critique (the exploration of boundaries) is crucial (Ulrich, 1996; Midgley et al., 2007; Helfgott, 2018; Helfgott and Midgley, 2020). More precisely, boundary critique entails an exploration of "exclusion, inclusion and marginalization of both people and issues" (Midgley et al, 2007, p 233).

For a convention to become an institution, its foundational ideas must become entrenched. Douglas (1970) investigates the entrenchment of ideas and their rise to the status of social conventions and later institutions, and I intend to argue that the same process can be traced in the passing of legislation. This is a process of legitimation. Similarly, the entrenchment of a theory is highly dependent on its coherence with other theories, and on its congruence with dominant perspectives in the philosophy of science.

This is the rationale of Luhmann's self-referential systems; that as long as events are being communicated in a way that is intelligible to the system, and which resonates with past systemic states, it can be recognised as part of the institution. The institutional binary code (legal - illegal) dictates whether any given communication can be 'heard' by the system. In this sense, the binary dominates all interpretations of communications, and a strict hierarchy exists, with the binary being at the top of a pyramid of communications that can be used for interpretation, with all new communications having to be routed through it. However, Douglas (1986) contests this hierarchical view of communication acceptance, by pointing to the need for new ideas to be assimilated into a cognitive and social process if they are to become operative. The entrenchment of an institution is in equal measure an intellectual, economic and political process. To

survive, institutions run on stabilising principles, which are analogies to the physical world or supernatural world.

To the social order, public memory is a repository of meaning. The process of constructing and reporting the past has a limited link to the past itself, but a direct one to the present (Douglas, 1970):

> "History emerges in an unintended shape, as a result of practices directed to immediate, practical ends. To watch these practices, establish selective principles that highlight some kinds of events and obscure others is to inspect the social order operating on individual minds" (Douglas, 1970, p 70).

Historical references to the Ottoman Yoke (described in Chapter 2) were common during the campaign that surrounded the burqa ban. After all, "[public] memory is the storage system for the social order" (Douglas, 1970 p. 70). Some examples were the following statements made by respondents in my fieldwork:

> "But especially in Bulgaria, it's very easy for people to hate us because of the history. The Ottoman empire ruled here for centuries" (Participant 27, 55, Turkish).

> "we are a minority and we are still, what can I say, we are repressed in some ways. It is not like before, when they used to really abuse us. But still – work, education, it's for the Bulgarians, not for us. It is all because of the history between Turkey and Bulgaria, we are paying the debt. Any child in school can tell you about the Yoke" (Participant 4, 60, Pomak).

> "...During Turkish rule, especially in Bulgaria, all the maidens wore niqabs... Because it reminds them of the Turkish rule, that is why they ban it" (Participant 12, 62, Roma).

Douglas does not abandon all hope for intellectual independence, despite the strong grip of institutions. Emancipation from institutional boundaries is possible, and the first step towards it is to discover how our minds allow choices between institutional boundaries and, vice versa, how institutions create boundaries in our minds. It seems that Douglas (1970) is indeed advocating for the performance of boundary critique, as discussed by Ulrich (1983) and Midgley (2000). But the intensity of institutional boundaries is also highly dependent on the type of social system we live in, as discussed below.

Grid and group

Douglas (1970) articulates an elegant theory of social organisation that she calls either 'grid and group' or 'cultural theory'. It revolves around two axes, the first of which is "grid" (Douglas, 1970, p. 62). Grid is the equivalent of social pressure on classifications. Durkheim (1915) consistently argues that classification systems emerge as biproducts of social relationships. If social pressures are formidable, then a shared set of classifications is upheld (Bernstein, 1964). Social systems become stable, unless counter-pressures are exerted from outside of the system. Innovations can also undermine existing classifications.
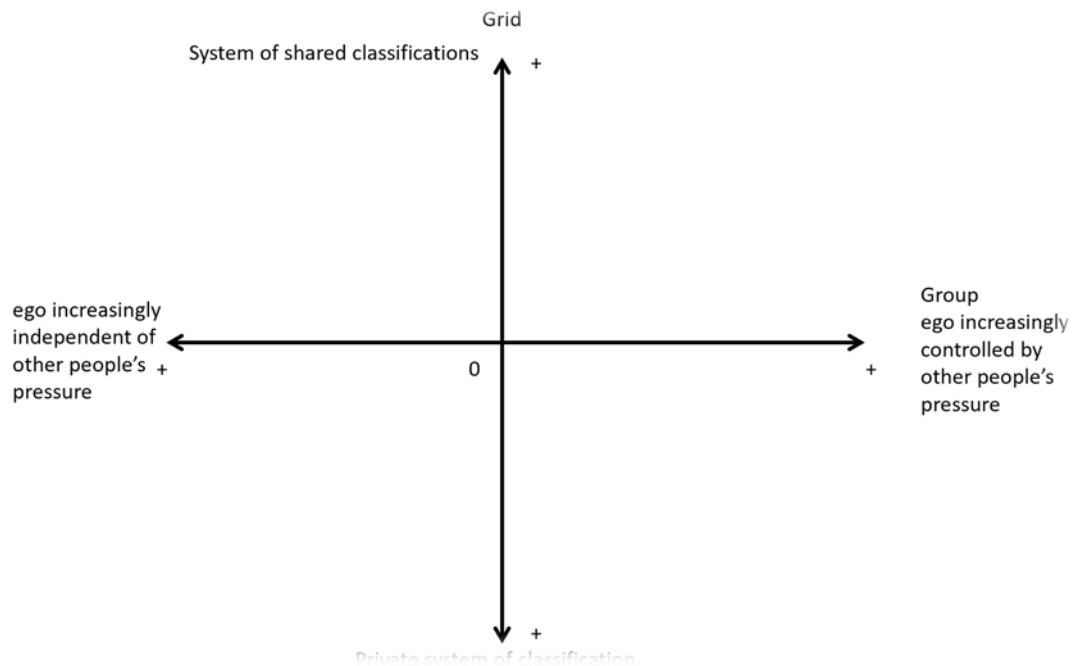
Figure 8.1. Grid and group (Douglas, 1970, p. 62)

The vertical axis ("grid") straddles conformity and innovation (Douglas, 1970, p.62). Where grid is high, conformity stifles novelty, while when grid is low, innovation comes into being. The theory is expounded at length in Douglas (1970, 1992). The other axis, presented in Figure 8.1, represents the intensity of the relationship between individual and group. This axis is termed "group" (Douglas, 1970, p 63), and it denotes social pressures and expectations placed on the

individual. Towards the right, individuals are bound tightly to other people, while on the left, they are relatively free of social expectations. The point I wish to make by presenting her cultural theory is that Douglas (1970, 1992) evidently moved from binary schemata, like the sacred and the profane, to a more spectral view of social organisation.

This is her answer to the then-burgeoning debate between liberals (individualists) and communitarians (collectivists), which is presented in greater depth in the previous chapter. Douglas's *Purity and Danger,* which was written in 1966, inspired Midgley's marginalization theory (Midgley, 1992, 2015). I believe that her later work is still congruent with boundary critique and can offer further theoretical tools for the study of identity and marginalization. Classifications such as 'foreign' and 'domestic', 'dangerous' and 'safe', emerge from social interactions. Classifications are also encoded in institutions (Douglas, 1970, 1986).

However, I believe that they become cemented even further in legislation. Legislation in Western democracies partly constitutes the 'grid'. Whether something is sacred or profane is declared officially in this legislative part of the grid. Western legislation demands legitimacy and a form of public consent (Hart, 1961), or at least enough tolerance that dissent doesn't threaten the legitimacy of government. For a social convention to become an institution, it must be legitimised by the public (Douglas, 1970).

Similarly, when these institutions become encoded in legislation, especially new legislation, its passage involves the public in at least some way or form — even when this involvement just takes the form of tacit acceptance (a lack of protest on behalf of the public). Conversely, in the ban on the veil example presented in Figure 8.3, established institutions from the social sphere can make their way to legislation and normative solutions. But oftentimes, actors with the ability to influence changes in the political landscape operationalise meanings from public memory, as this is (as we have seen) the "storage system of the social order" (Douglas, 1970, p. 70). The reference to meanings from the public memory is necessary to gain the social consent for meaningful political decisions.

Marginalization revisited: acceptance, blame and victimisation

If we return to the origins of marginalization theory, the sacred and the profane are the two absolute value categories proposed by Douglas (1966). These categories are static, in the sense that they describe states. A phenomenon, person or issue is either sacred (valued) or profane (devalued). In her later work on risk, Douglas (1992) conceptualises techniques of exclusion and control, where people or groups shift their status from sacred to profane or from profane to even more profane. Exclusion and control are attained through the instruments of blame and victimisation. Douglas reviews blame and victimisation as two strategies of profanitizing in her observations on tackling leprosy and witchcraft in pre-modern societies. Lepers and witches are marginalized and profane because they pollute the social order with something 'alien'. However, profanitization does not always take the same shape. While witches are accused of bringing disasters and misfortune to the community, and are marginalized through the instrument of blame, lepers are vulnerable because of their sickness and low status. Lepers are the victims of their disease and, since it incapacitates them, they should be separated from the rest of society, in enclosed colonies that rely on charitable alms. Thus, in the case of leprosy, marginalization is achieved through the vehicle of victimisation.

Blame and victimisation are used to cement power, or sometimes for a group to shift their status from profane to sacred: for instance, an initially-profane group may engineer such a change by attracting approval, and thereby attributions of sacredness, for targeting those who are regarded as more profane than themselves. It is the legal system that serves powerful agents in establishing ethical dominance. Through legislation, various actors cement their sacred status too. That is how the United Patriots Party in Bulgaria, who were marginal in the political sphere, gained their power – by focusing their blame on the face-veiling minority (this process was covered in the chapter on the passing of the face-veil legislation in Bulgaria). Thus, as Midgley (2015) describes, actors can shift their relative position from marginal to central, by marginalizing another actor. The shifting of the relative position of this Party happened though the vehicle of blame. The popular

conversion to Islam in Muslim enclaves was framed as a disaster for the Bulgarian State and a possible node of radicalisation. Blame for disasters can be cast in two general directions – internally against the community, or externally against a foreign enemy (Douglas, 1992). In the case of the ban, blame was cast against the Muslim Roma *as well as* against a foreign enemy who was seen as destroying the European democratic project. The following quotations are translated examples of the justification for proposing the ban, to be found in Bill 654-01-58 (2016):

> "This bill seeks to protect humanism, gender equality and democracy – principles that are fundamental to the value systems of the Republic of Bulgaria, the European Union and other developed democratic States".

> "[T]he present bill aims to protect the dignity of female citizens alongside ensuring their freedom of choice".

> "This piece of legislation addresses the stark need for a State response to the aggressive human rights violations that many women in Bulgaria have experienced lately. Additionally, this bill would reinforce national sovereignty, identity and national security by countering assimilationist and aggressionist attacks that are generally forbidden in the Constitution of Bulgaria".

> "There is a clear conflict between such behaviour [veiling one's face] and the secular laws of our country. Additionally, there is a conflict with the thousand-year-long tradition of local Muslims who do not express similar radicalism. The true motivations behind these demonstrations of radicalism are not religious, nor humane, but political and funded by money from countries in the Orient and the Persian Gulf. These countries are infamous both for their instability and rampaging Islamism".

Acceptance is the opposite of blame. Social psychology tells us that the formative processes of identity have to do with accepting values, issues and people, and with rejecting other values, issues and people (Tajfel and Turner, 1987). The Roma enclaves have welcomed many Evangelical and Muslim preachers, and there has been a rise in religious sentiment, both Christian and Muslim. However, Evangelists were not blamed, and their religious fervour not suspected. Bulgaria is officially a Christian Orthodox country, and Evangelism represents the same Christian value pattern. Hence, a ritualistic expression of Christian identity would not be deemed unacceptable. Indeed, it bears the stamp of social acceptance. To

return to the blame dynamic, two accusations stand. Predatory foreign actors are accused of taking advantage of the vulnerable Roma. On the other hand, the Roma themselves are blamed for buying into the new value system and engaging in a symbolic exchange with the foreign enemy. It seems that the severity of the supposed transgression and its sanction can tell us a lot about the framing of the rule, the transgression and the dominant idea of 'the good' (Taylor, 1989). Wearing a veil is regulated in legislation as an administrative offence. Administrative violations attract fines, while criminal offences are sanctionable by imprisonment, forced labour, etc. — i.e. stricter measures. Thus, the State has deemed wearing a veil as a violation of its rules of public organisation, as administrative legislation dictates procedures of civil life (Hrusanov, 2012).
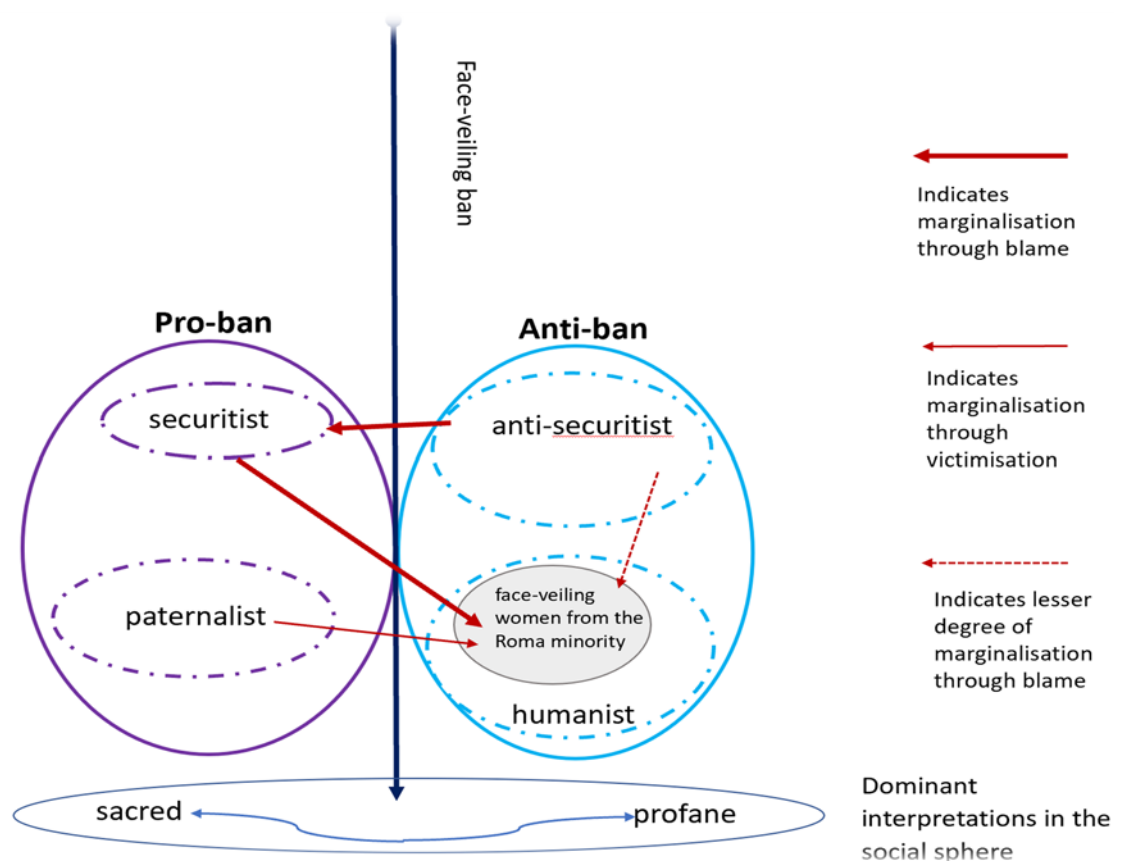

Figure 8.2. The four perspectives and their marginalization dynamic.

Normally, when discussing the veil, people would refer to procedures and rituals of Bulgarian civic life – which was also evident from the discussions I had. What became apparent though, is that blame, victimisation and their severity illuminate the degree of marginalization of people and issues.

The purple lines in figure 8.2 represent the State's view on the burqa – that it poses a danger to society, and it is a form of repression of women. Securitists and paternalists are the two pro-ban perspectives I have identified. It is possible that there might be other perspectives out there, and perhaps if I had had the luxury of funding for a longer research trip, and another year to complete my thesis, I could have engaged more participants. This might have uncovered further perspectives, or more nuanced sub-perspectives, although it is impossible to know for sure. I therefore undertake my analysis of the four perspectives in the knowledge that I am basing it on a limited data set (although one that was not possible to extend within the time and resources available), and I advance my interpretations and theory developments as contributions to the literature that could be open to future revision if contrary evidence emerges in further research.

The securitists have the narrowest boundary judgement, as they have a limited evaluation of stakeholders and, as I have demonstrated in the previous chapter, they align their thinking with the blaming of both Roma minorities and foreign actors that represent Muslim majority countries. The paternalists see women as beneficiaries of the ban, and their boundary judgement is wider than that of the securitists, but they victimise the veiled women. This is so because, to paternalists, the veil is a restriction, a symbol of structural violence and the forced immaturity of women. Thus, their view is also defined by blame, albeit directed at another element of the veiled women's environment, and not against the women per se. Thus, to reflect the victimisation of women and the indirect character of blame, the red line that signifies blame is thinner when coming from the paternalist camp.

The anti-securitists and humanists are in blue, and they present alternative moral judgements on the burqa. They use wider boundary judgements because there is a bigger variety of stakeholders in the transformation, from their points of view. Anti-securitists react negatively to securitists, and they believe politicians are using people's sentiments to advance political agendas. Thus, their position is also

influenced by blame, pointed at various actors. The anti-securitists blame the State, the media and the people for being Islamophobic, but some of them also blame the Roma. As I have demonstrated, and to my surprise, some anti-Roma statements came from the anti-ban camp, more particularly from anti-securitists. Thus, some anti-securitists shared blaming attitudes with securitists.

The veiling women of Roma descent in the context of Bulgaria were blamed for being illiterate, for accepting Saudi alms and for veiling for the wrong reasons. Thus, although the anti-securitists were anti-ban and shared some values with the humanists, they still marginalized the veiling Roma. This illuminates the fact that, even when a law that involves marginalization is opposed by citizens, this does not mean they do not share the stigmatising values that uphold it. As the anti-securitists only marginalized the Roma, their blame was not extended to foreign actors or to veiled women of other descent. It appears that there are many levels of marginalization, and when a stakeholder marginalizes agents of power (the politicians) and those who follow them in a marginalizing strategy (the ban), this does not automatically mean that the victims of this marginalization – in this case, the veiled Roma – are not going to be profanitized by the same stakeholder.

While the anti-securitists blamed the State for the passing of the ban, the humanists, on the other hand, did not cast any blame. Nevertheless, there was a sense of rejecting the official value judgement; a critical stance that everyone's humanity should be respected. Some of the veiled humanists, however (all of the veiled women I interacted with subscribed to the humanist perspective), also expressed some acceptance of their relatively marginal position in society.

 This is why I suggest that the relationship between the pro-ban stakeholders and the humanists is not one of equal opposites (each blaming the other), because there is no blame in the humanist perspective. Thus, I have modelled the humanists as not actively participating in the marginalization dynamics (there are no red arrows emanating from the humanists in Figure 8.2). By this, I do not mean that they are not actually subject to marginalization – indeed, the pro-ban perspective ascribes profanity to the wearing of the veil, and all the veil wearers understood that the legislation cemented their marginalization in place. It's just

that their perspective sought to transcend the blame culture instead of treating others as they were being treated.

However, the *degree* of profanity that a legal act attributes to a group is also an important aspect of the analysis. Evidently, there is a difference between a custom, such as adultery, being frowned upon, and an Act of Parliament that criminalises extramarital sex. I have illustrated the different degree of marginalization with the thickness of arrows in the model. For instance, securitists and paternalists heavily marginalize the veil-wearers, and they were the ones who advocated for this act to be legislated against. Anti-securitists marginalize the Romas who wear the veil, but not the act itself; and in any case, they do not endorse a ban on the act. Thus, their marginalization is signified with a dotted arrow. Thus, the concept of profanity is not binary: it exists on a spectrum, and the same is true for the concept of sacredness. In terms of identity formation, these categories are related to processes of acceptance, blame and victimisation.

Legal interventions into the sacred and profane

Human beings do not dwell in a vacuum: we create social units and organise within them. As I have argued in the chapter on identity, there is no 'starting point' where either the individual or the social is prime. The individual negotiates their behaviour with the collective, and the collective negotiates rules for social behaviour with individuals (Giddens, 1984; Gregory, 1992; Etzioni, 1993). There is agency at both scales. However, I use the term 'negotiate' loosely, as I do not wish to be politically naïve - some forms of organisation leave very little space for the individual adjustment of rules. For example, in the education system, the benchmark for fail will always dictate that every result below it constitutes a fail, even when the individual student interprets their efforts otherwise. However, benchmarking can change once alternative viewpoints on what a fail should be gain traction. When the case has received support from those with authority to act, it may well change.

Recall that Midgley's marginalization theory illuminates processes where binaries inform value judgements. A marginal element is considered as having a different status, depending on the perspective of the observer. This status could be sacred (highly cherished and valued) or profane (devalued, feared, blamed). Recall that the ban on the veil involved the publication of motives accompanying the legislation, which expressed blame of minorities and Muslim-majority countries. My respondents, however, did not necessarily align their value judgements with the ban. Indeed, four distinct perspectives emerged, all defined by the justification of their value judgements. The pro-ban securitists cherished national identity and security, while paternalists saw the need to defend freedom and the emancipation of women. On the other hand, anti-securitists prioritised the freedoms of citizens but also the responsibilities of the State towards protecting freedoms and ensuring security by providing education, infrastructure and medical services to its citizens. Finally, the humanists advocated for the universal freedom of non-violent faith expressions and treated the veiled women either as sacralised persons who deserve admiration, or as normal, regular citizens who should not be separated and distinguished on the basis of their faith and lifestyle.

I believe that introducing consideration of the role of legislation into marginalization theory (Midgley, 1992, 2015) could illuminate the process by which value categories are cemented. Recall that Midgley's critique of Luhmann (1988a, 1988b) is that social systems do not just hold binaries but have dominant moral categories that establish a 'strong framing' (Midgley, 2009). Similarly, Douglas (1970) claims that an institution must be socially entrenched and widely accepted for it to be operational in informing value judgements.

Figure 8.3, below, aims at illustrating the process by which the status of veiled women transcends systemic boundaries and changes from invisible to profane. It is the legal system that serves powerful agents in establishing ethical dominance. Through legislation, relatively disenfranchised actors can cement their sacred status too. That is how the nationalistic party, who were marginal in the political sphere, gained their power — by focusing on the face-veiling minority. These powerful people were marginalized until recently, and only by making the face-veiling Muslims profane, on the grounds that they supposedly accelerated the

growth of terrorist enclaves and foreign influence, were they able to shift their relative position from marginal to central. The shifting of the relative position of this party happened though the vehicle of blame. Once many people in the general population aligned with this blaming (as it tapped into historical fears), political parties that do not condone the veil could be tarnished by association.

In the case of Bulgaria, the blame is distributed between the Roma (internal transgressors) and foreign influencers (foreign Muslim preachers). The disaster of a veiled terrorist has not happened yet, but the political agents claim that it is coming – and this is typical when the language of risk is used. Risk is always future-oriented, hence speaking of risk makes present actions hostage to future detriments (Douglas, 1992).

Here it is useful to point out something else I found during my research – that approximately ten years before the many conversions to Islam, the Roma enclaves attracted the attention of Evangelical preachers, who moved into those communities to convert them, and churches were built by various foreign religious organisations. However, the Muslim charities that had the same function of bringing religious structure into marginalized communities around the world, attracted negative attention. Indeed, one of my respondent's brothers was an Evangelist, and many of the men arrested for extremism were builders who, at the time of my interviews, were working on an Evangelical Christian temple in their village. Hence, the temple remained on pause until the men were released, and they later finished it. It seems that, within the Roma community, there was no issue between the Muslim and Christian converts, who sometimes even came from the same family. Moreover, Muslims would work on the construction site of Christian temples. Blame was simmering *beyond the boundaries of the Roma enclaves.* The Muslim Roma attracted blame, not the Evangelist converts, because for a blaming strategy to work, the dominant political actor must concentrate it on the most marginalized social group (Douglas, 1992).

The goal of a blaming strategy is either to cement the existing system or to cement changes to the existing system by justifying a pattern of power. The language of risk, on the other hand, enables a spurious scientific claim of causality – marginalized people who are Muslim converts are at risk of radicalisation. Risk is

equated with danger, and this is problematised by Douglas and Wildawsky (1989) and Douglas (1992). It is easier to reinforce negative attitudes than to generate them from scratch. Hence, it was the coupling between the profanitized marginalized Roma on the one hand, and the symbolic expression of Islam (the veil) on the other, that led to a strongly-consolidated blaming strategy.

Thus, after only a year of campaigning against the face-veiled Roma, the United Patriots Party gained significant electoral support. Finally, the veiled Roma are supposedly at risk of radicalisation, which is additionally showing them in a marginal victim position, where they are 'sinned against' and must be 'protected'. The sinning against is done by external actors (foreign preachers), who represent other (alien) value systems that are deemed profane by the party campaigning against them.

To muster the dominant reading of boundaries, the patriots utilised the tools of blame and victimisation. Indeed, the United Patriots used the idea of the old 'arch-nemesis', the Ottoman empire, to profanitize Saudi Arabia and other Muslim countries where the veil is acceptable. All patriotic parties in Bulgaria (and elsewhere) use old episodes of marginalization to establish their reading of the sacred and profane through the instrument of blame.

The Ottomans are blamed for enslaving the Bulgarians of old, and the Saudi, Syrian and Iraqi people are blamed for 'recruiting' or 'brainwashing' the victimised Bulgarian Roma. The blaming agent who seeks to cement their sacred status is always searching for a new target and relying on archetypical enemies is a common political strategy. However, the twofold marginalization of the Roma, on one hand, and the ritual expression of the burqa, on the other, generate different patterns among the thinking and identities of the respondents.
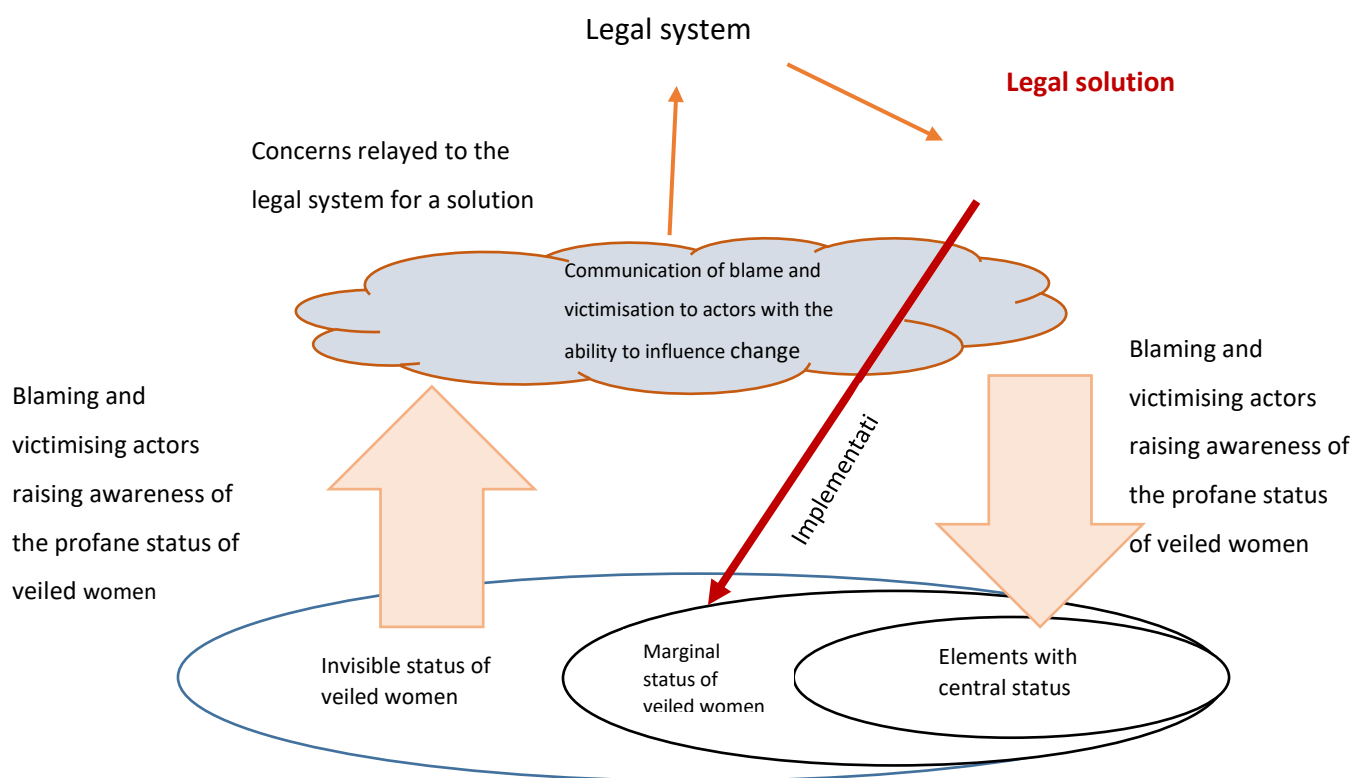
Legal system

Legal solution

Concerns relayed to the
legal system for a solution

Communication of blame and
victimisation to actors with the
ability to influence change

Blaming and
victimising actors
raising awareness of
the profane status of
veiled women

Blaming and
victimising actors
raising awareness of
the profane status
of veiled women

Implementati

Invisible status of
veiled women

Marginal
status of
veiled women

Elements with
central status

Figure 8.3. Legal intervention attributing a profane status.

Before 2016, the status of veiled women under Bulgarian legislation was invisible. By invisible, I mean that the legal and social systems did not include the veil within their boundaries. The women who wore the veil, though, were not *literally* invisible; they were treated as subjects of law from the viewpoint of legislation. However, while there have been accounts of general islamophobia (Taras, 2013), the issue of the veil was not discussed in the media and political circles until 2016.

Different actors with the ability to influence change engaged in the business of shifting the status of the veil. The example of cementing the profane status of veiled women illustrates a process that is largely ignored by sociologists and social identity theorists alike. The ultimate legitimacy in any country is with its official agents of power: the kings, governors, prime ministers, presidents and parliamentarians who hold the license to jurisprudence and its implementation. The State has a monopoly of legitimate use of force to implement legislation

(Weber, 1918). For example, Kelsen (1934) asserts that the power of all legislation boils down to its implementation – it is only regarded as important by society if it satisfies the condition of '*sanctionability*' (i.e., sanctions can be imposed when the legislation is acted upon). In the case of the veil, people who cover their mouths, ears and nose are subject to fining (Act Limiting Garments Partially or Fully Covering the Face, 2016).

Upon establishing such a violation, a judge can implement a fine that is clearly defined in legislation. It follows that, in Bulgaria, the sanctionability condition is met, and the profane status of veiled people is guarded by a judicial and administrative apparatus. Conversely, in the countries where formal institutions have not cemented a rule on covering one's face, the people who cover their faces are not attributed a profane status. This may seem obvious, but too often the analytical focus of social scientists is aimed at informal institutions, social groups, culture and so on, while legislation is ignored, perhaps because it is the subject matter of the discipline of law and therefore placed outside the boundary of sociology. It is the formal rules that help cement the value terrain – what is lawful and unlawful, forbidden and allowed, is codified in the rules that facilitate human organisation, and because of their relative stability and enforceability, these rules act to shape thought and behaviour.

Conclusion

In this chapter, I have argued for the need for a new systemic theory of identity that considers legislation as a source of dominance over value judgements. I presented my views on Luhmann's (1988a, 1988b, 2004) self-referential systems theory of institutions, and on Douglas's (1970, 1986) grid and group theory, as well as her analysis of ritual expression (1970) and risk (1992). Social identity theory (Tajfel and Turner, 1986) postulates that people self-organise in groups, and that from this self-organisation, value patterns emerge. It also elaborates on the human tendency to seek out distinctions, make relative comparisons and largely marginalize group-outsiders.

The grouping of people is the result of processes of classification, identification and socialisation (reviewed in depth in Chapter Four). As I have argued in the same chapter, identity processes are best modelled through Midgley's (1992, 2015) marginalization theory, as issues and people in the process of socialisation and identification are either framed as sacred or profane. However, no theory to date includes the ethical dominance exerted via legislation and its links to personal morality. What is lacking in the literature is a systemic theory of identity that relies on systemic theories of marginalization *and jurisprudence*. It is precisely this kind of theory that I have begun to develop in the current chapter, drawing on the ban of the face veil in Bulgaria as an empirical example.

I have argued that, while binary oppositions are foundational for social conventions, their absolute contrast is too restrictive for illustrating profanity and sacredness. Human evaluation is no simple thing and claiming that negative evaluations exist on a spectrum is almost as reductionist as claiming they can be summarised in one single word: profane. Still, presenting evaluation in a graduated manner is at least a step on from the rigidity of binary categories. I have also argued that, in law, issues can move from the realm of invisibility to be attributed a sacred or profane status. Sometimes by profanitizing issues such as the veil, other marginal actors become central.

Chapter 9 : Discussion and conclusion

It was my assumption that ordinary people had their own opinions but lacked the political capital to resist legislation that marginalizes or bans unacceptable behaviour of minority groups, such as outlawing LGBTQ+ relationships or forms of worship like the veil. When Bulgarian political parties started campaigning against the veil, I knew that this would be a good example, a good research environment where I could study the reactions of people to the legislation that was clearly targeting a specific segment of the population. It was the reactions of the others, the ones not obviously and directly affected by the marginalization, that I was most interested in, rather than the accounts of face-veiled women themselves, although these women hold an important place in my analysis, and I am grateful they trusted me with their stories.

My curiosity was about the views of those groups who do not suffer personal negative consequences because of who they are. Would there be empathy? Contempt? Pity? A sense of justice or injustice? All these questions were spinning in my mind as I was following the face-veil debates as covered in the Bulgarian news media. Politicians, sociologists, medical doctors, security experts, human rights lawyers and NGOs all contributed to these debates, but none of these actors were Muslim, either secular or pious. Except for some very limited statements by the Chief Mufti and scattered, relatively unknown Muslim politicians, the voices of ordinary Muslim citizens were either muffled or rendered completely silent. I was sure, if given the opportunity, Muslims would have commented on the ban.

I was not aware what these comments might be, but surely Muslims would have had something to say – and by listening to them, I would also be able to answer some of the questions that had been bothering me for years. How do people react to cemented marginalization, supported by power structures? What is the relationship between marginalization and identity? Is there something like a 'common moral compass' within an ethnic group, and does the State affect it? Hence, in this final chapter, I will consolidate my findings by returning to the

initial research questions that fuelled my investigation, and I will communicate the answers that I have arrived at, as I come towards the end of my PhD journey.

Before laying out these answers, however, I want to say that I experience the discomfort of not having been able to produce *final* answers, to lay these questions to rest once and for all. Nevertheless, I comfort myself with the thought that this PhD is nothing but a step on a longer journey, and the new questions it has triggered will serve as a driver in my future research endeavours. This is, after all, the nature of research: in principle, our knowledge is never complete, and even the most seemingly settled answers can be opened up to renewed questioning by future generations of scientists (Popper, 1972).

The rest of this chapter is structured as follows. First, I will summarise my key findings in a concise paragraph. Then I will return to the key questions that informed my research project – the research questions presented in the introductory chapter of this thesis. I will go through every question and then present the answer I have arrived at, while bearing in mind the limitations that were placed upon me by the pre-set length of time and financial backing I had available for my work. The section following the answers to my research questions will further engage with the limitations of the process. Afterwards, I will discuss possible future directions for my work. Finally, I will conclude with reflections on the implications of this research for policy development.

My contributions

Methodological contributions

My work offers two methodological contributions: on the use of BATWOVE for knowledge production, and the sequencing of the elements of BATWOVE. First, BATWOVE may be applied as a retrospective framework for identifying structured themes in transcripts. Checkland (2015) argues that SSM can be used for knowledge production (as well as for supporting intervention) and, in this sense, I have followed his original intention. However, I have not used BATWOVE for knowledge production in the most obvious way, which would be to talk with those

directly involved in delivering a transformation and look at their thinking about it (this is the use that seems to be assumed by Checkland). Instead, I took a national-scale, legislation-enforced transformation (the banning of the face veil) and examined how actors *not* involved in it viewed what was happening, using the BATWOVE as an interpretive device.

This way of employing the BATWOVE mnemonic could be useful more generally when applied to evaluating interventions initiated by powerful actors, such as the State or political players. It could not only reveal how people interpret a change retrospectively (after the intervention has happened) but could be used during the liminal (transition) period to see if and how the interpretations of stakeholders evolve over time, before new political norms become settled.

In addition, however, BATWOVE could also be applied to transformations where there is no clear owner or actors – my analysis revealed that the BATWOVE was useful even when the interviewees had no view on ownership and other stakeholder roles, making it possible (theoretically, at least – this would have to be tested in future research) to examine interpretations of systemic transformations that are not under the conscious control of any one set of actors, such as the arrival of an economic recession or the impacts of climate change.

These methodological innovations came as a surprising by-product of my approach to data analysis, and they were not goals set out at the start of my studies. Like most PhD students, my research questions, when I started out, were focused solely on the topic of my research (perceptions of the banning of the face veil), and not on the process by which I was going to produce knowledge on this topic. It only became clear, as I started reading about systems thinking (especially Midgley's, 2003, four-volume set of classic papers, which I read cover to cover early on) that it is commonplace for systems researchers to produce methodological (process) innovations alongside, or in preference to, theoretical (content) ones.

My methodological innovations emerged after I was advised by Merali (2018) to experiment with SSM (Checkland, 1981; Checkland and Scholes, 1990; Checkland and Poulter, 2006). In particular, Merali (2018) suggested that I could use CATWOE to analyse perspectives on the face-veiling ban, taking the ban to be an intervention that could be analysed in terms of stakeholders' views on the

transformation(s) they thought were happening. Checkland defines the customer in the CATWOE as those stakeholders who may benefit or be victimised by the transformation in focus (Smyth and Checkland, 1976; Checkland, 1999). Then Midgley (2019a) introduced me to BATWOVE (Midgley and Reynolds, 2001, 2004), which includes 'beneficiaries' and 'victims' as stakeholders instead of 'customers'. I found the latter more useful due to the nature of the intervention I was studying, as missing out victims could have involved marginalizing the women who saw face-veiling as an essential part of their lives. I did not want to replicate the very phenomenon I was studying. Moreover, I wanted to focus my attention on the victim-versus-beneficiary dynamic. Thus, I used Midgley and Reynolds's (2001, 2004) BATWOVE to organise the emerging information from my transcripts.

This led to a few discoveries. As I elaborated in Chapter 7, there seems to be a robust link between transformation, worldview and environment. The modified version of SSM could illuminate different perspectives on State-led interventions in a structured manner, by identifying key stakeholder groups, such as the victims, owners and beneficiaries.

Importantly, the worldviews and environmental conditions specified by the respondents seemed to be intimately connected. This called for a revision of the order in which the environmental constraint component is usually deployed in a BATWOVE analysis: previously it has been placed at the end, but this study suggests that environmental considerations should be reviewed in tandem with the worldview. Specifications of environmental constraints are essentially the boundaries that the stakeholder places around their analysis of what an intervention can control or influence, which also strongly influences the value judgements the stakeholder makes on the intervention itself (Ulrich, 1983; Midgley, 2000). Of course, this could be said for all the other BATWOVE components (e.g. who a stakeholder identifies as beneficiaries and victims feeds back to their value judgements), but the environmental constraints are particularly significant because understandings of context really matter for action – so much so, that Matthews (2004) argues that the move from the production of supposedly universal (or generic) problem and solution analyses to analyses that are focused on responding to the particularities of local contexts marks the largest and most practically-significant paradigm break in systems thinking – more important,

indeed, than the transitions between the three waves discussed in Chapter Five. My research has shown that the specifications of environmental constraints included all stakeholders, their abilities and desires, and the social norms (e.g. culture and formal institutions). Thus, assumptions about the environment (what can or cannot be influenced or controlled) play a significant role in value judgements and worldview formation.

This may be important for SSM workshops where stakeholders are invited to reflect on an existing systemic intervention or to co-design a new one. 'Systemic intervention' is defined by Midgley (2000, p.8) as "purposeful action by an agent to create change in relation to reflection upon boundaries". My SSM modification makes it easier to focus on the relationship between worldview and environmental constraints. Thus, it can contribute to improving reflection on the boundaries of influence – boundaries placed around a liminal state (a time-bounded period of change) – and their connections with a worldview and the stakeholders who are perceived to be involved in and affected by the intervention. Thus, I intend to use my version of the BATWOVE and to develop it further in future projects.

Theoretical contributions

The following sections will re-present my research questions and summaries of my answers to them.

1. *What are the systemic effects of the face-veiling legislation in Bulgaria in terms of Muslim identity formation?*

My BATWOVE analysis illuminated that two opposing camps arose in relation to the ban. However, each camp comprised two main perspectives, so four perspectives emerged in total from the ban. Three out of the four show the inclusion of stakeholders in the analysis, while one seems most exclusive and constant in its views – the securitists' perspective. However, the latter perspective is the one advocated by the political parties who championed the legislation,

implemented by the State. It seems that the other three perspectives only came into being because of the existence of the dominant securitist perspective. Thus, the other three are formed *because of* securitism – whether as an extension of it (paternalists) or in opposition to the position of the State (anti-ban: humanists and anti-securitists).

Securitism stands out with its exclusive focus on the non-Muslim majority – the respondents who were classified in this group were firm in their beliefs and quite straightforward in expressing them. Additionally, the securitists showed no awareness of different stakeholders and their roles in the process: the owners, actors and victims were completely absent from securitist accounts. The other sub-group in the pro-ban category were paternalists. Their awareness of stakeholders in the process was more developed. Some paternalists demonstrated awareness of owners and beneficiaries, while victims and actors were still not accounted for.

Those who were anti-ban presented a good grasp of the stakeholders involved in the intervention. There were accounts of actors and owners, as well as victims and beneficiaries. An interesting feature of these accounts was the overall distrust of the State and its intentions. While pro-ban people aligned their ideas with the dominant perspective, anti-ban respondents opposed it. It is evident that, although the ban was initiated, passed and implemented by the State, not everyone agreed with it. Many of my respondents shared personal accounts of marginalization and discussed the vilification of Muslim minorities.

The fact that respondents remembered personal anecdotes of marginalization is significant. These memories sketched different forms of marginalization and the respondents' reactions to it. Some recalled being verbally attacked on the street, others their forced resettlement or a voluntary exile due to the Revival Process. Some recalled failed personal relationships, being denied access to health services, or police investigations in their place of work. Despite the differences in these instances of marginalization, they were all related to the topic of the burqa ban, even though some of the events took place decades before the bill.

2. What is the relationship between marginalization and identity formation?

To build my theoretical foundations, I sought inspiration mainly from two intellectual currents: social psychology and systems thinking. Chapter Four presented the principle theoretical advances in terms of relational identity theories. As stated in that chapter, I had narrowed my exploration to relational theories due to their systemic approach to relations between individuals and their wider social and institutional environments. Relational identity theories are found in the realm of social psychology.

Social psychology and social identity theory postulate that individuals share a common value system with the ones they see as 'in-group' individuals, and they experience a "self-categorization" process where they subscribe to a certain social category or group (Turner et al, 1987, p.42). The main argument of the communitarians is that there is an ideal of a life worth living that is set out by the collective – the so-called 'good' (Taylor, 1989). My analysis revealed that the idea of what is good differs among the representatives of the different ethnic groups. Moreover, their justification for either supporting or rejecting the ban was at times due to the social groups they thought they belonged to. For example, people from the humanist spectrum opposed the ban due to a shared identity with the veiled women. This group was, according to the humanists, 'all human beings'. This perspective chimes with the main argument of Sen (2006), who advocates for a lasting peace through transcendence of narrow social group categories like ethnicity or religion.

To refresh our memory, Chapter Two reviewed the history of the main Muslim minorities, representatives of whom I had contacted for interviews. The analysis showed that there was no link between ethnicity or level of religiosity and the way perspectives were formed. Indeed, often people led me to other respondents who were from the same ethnic group but held a different view (in tune with the modified form of snowballing advanced by Dick, 1999). This technique could have led to more diversity in my sampling than would have been apparent had I used a random sampling technique. Also, the sample I worked with was relatively small,

which is acceptable for exploratory research. This is because I did not endeavour to explore *prevalence* of belief, but what *kinds* of belief might exist in Bulgaria. My research raises some questions about whether values-commonality really aligns as strongly with social identities as other authors (Tajfel and Turner, 1987) have claimed. Because of the limitations of my methodology (just discussed), more research using a large, representative sample would be needed to further test this before firm conclusions could be reached.

Religious people did not necessarily oppose the State's intervention, while secular stakeholders did not necessarily support it. For example, the securitists were three Arabs (all very religious and praying five times a day), one Roma person and three Turkish people; the paternalists were four Turkish people, two of whom were religious, and two Pomak people, only one of whom was religious; the anti-securitists were four Turkish people (two of whom were religious), two Arabs (one secular and one religious), one secular Roma person, and two secular Gagauz respondents; while the humanists (the largest group) consisted of six Roma (four of whom were pious women who face-veiled at some point in their life), three Pomak, three pious Bulgarian converts and two people of Turkish descent (only one of whom was religious).

Thus, although my findings cannot be said to falsify the social identity principle of shared values and boundaries (because of methodological limitations to my study, mentioned earlier), they nevertheless raise *questions* about the belief in value commonality. The fact that there was a disproportionately high number of Romas in the humanist group, and all the active face-veil wearers subscribed to the humanist perspective, could be explained by the fact that they are most heavily marginalized.

Gregory (2000) discusses the views of many sociologists that individual identity is formed through processes of individuation, socialisation or both. While individuation proponents argue that identity comes from within and is a strictly personal process of self-reflexiveness (Giddens, 1991), communitarians claim that identity emerges from socialisation (Tajfel and Turner, 1987; Taylor, 1989; Benhabib, 1992). Thus, there is a dualism of processes, and (generally speaking) one is seen as primary and the other as secondary, with different theories revolving

around the two poles – focusing primarily on individual or collective identity and seeing the other as subsidiary to the primary focus. Gregory regards this dualism as non-systemic, and she integrates these approaches in a model that demonstrates "the interconnections between individual self-creation and societal forces" (Gregory, 2000, p.484). The importance of perceptions of environmental constraints that was revealed in the analysis suggests that, indeed, individual value judgements were heavily based on perceptions of societal forces. Whether the individual aligned with or renounced social forces was also a determining factor in making boundary judgements. This, of course, does not mean that perceptions of societal forces are not the product of boundary judgements. Indeed, environmental constraints are all about boundary judgements: the boundary that is been drawn is around factors that are within the power of influence of the stakeholder, and those factors beyond their power of influence. However, even factors outside control, by virtue of being identified in the analysis, *were within the boundary of consideration*. These factors represented important elements of context, a justification for the worldview, and ultimately led to evaluations of the veil and the ban as either sacred or as profane. Thus, I argue that setting the environmental constraints through boundary judgements is an important heuristic device for subsequent boundary judgements. This was mostly evident in the fact that supporters of the ban who felt optimistic about politics, or the ones who wished to feel part of the State project, readily supported the face-veil ban and sought to marginalize and make profane the people who cherish it.

In a systemic sense, marginalization is a process of separation between constructs. The separation is done by drawing boundaries, and what these boundaries identify can in turn be interpreted as sacred or profane (Midgley, 1992). In the work of Mary Douglas (1966), sacred corresponds with normal and/or pure, while profane means dirty, disgusting and/or disorderly. These moral categories were an inspiration to Midgley (1992), who built his marginalization theory by arguing that the marginalized have a special status that can either be viewed as positive (sacred) or negative (profane), but it is when this special status is assigned that marginalization comes to life. The theory of marginalization (Midgley, 1992) and the later theory of value conflict (Midgley, 2016) are discussed in more detail in Chapter Five. Both these theories, of marginalization and value conflict, were

useful for my systemic reflections on the perspectives that arose from the face-veil ban.

To refresh the reader's memory, the theory of value conflict emanates from the wider school of boundary critique in the third wave of systems thinking. It was originally arrived at independently by Midgley (2000) and Yolles (2001) and explains how the same phenomenon can be interpreted very differently by distinct stakeholders. The differences in interpretation also reveal what the problem/solution nexus is for each stakeholder group. Say, the phenomenon under scrutiny is the face-veil. Those who are pro-ban frame the face-veil as a problem and its ban as a solution. A quite different perspective is held by those who are anti-ban, as they do not view face-veiling as a problem at all. Still, both groups feel strongly about the ban and have different interpretations of it. All the perspectives that I identified had a juxtaposition with some external actor or group of actors who served as benchmarks for identification or differentiation. While the pro-ban stakeholders claimed that Bulgarian Islam is different to Irani or Saudi Islam, and identified the face-veiled Bulgarians with extremists, the face-veiled Bulgarians rebutted this, saying that they are simply women, and citizens of the same State, who should be allowed to worship.

The divisions that transpire are systemic, as the different positions people take are defined *in relation to each other*, much like two sides of a coin. This is similar to the different perspectives on Brexit in the United Kingdom (Midgley, 2019a). The pro- and anti-Brexit supporters are defined against each other, while both recognise the fact that all the advocates are residents of the UK, so share an element of common identity.

Still, the definition of what is 'British', 'English', etc., varies between people, depending on how these terms are conceptually networked with other political ideas. Similarly, the camps that arose from the face-veiling legislation are defined with reference to their differences, even though they all anchor their positions in relation to 'Bulgarianness' and/or wider 'Europeanness'. While the pro-ban stakeholders believe that being Bulgarian (or European) eliminates the legitimacy of wearing a face-veil, those who oppose the ban hold the opposite view because of the Bulgarian and European history of migration. Moreover,

both perspectives host two sub-perspectives that also mirror each other – the paternalists and humanists are both invested in the freedom of women, while the securitists and anti-securitists are keen on national security and the responsibility of the State to protect its citizens (Figure 9.1).

What came as a genuine surprise was the fact that those who were pro-ban were not even aware of the existence of those who were anti-ban. *It appears that a differentiated system of perspectives can emerge without all its participants being aware of the parts and their relationships to one another*. The pro-ban position was formed purely based on alignment with the governmental face-veiling project. Perhaps due to the lack of representation of a critical perspective on the ban in the mass media, advocates of the ban did not refer to critics of the ban at all. Instead, they focused on domestic and international actors, deemed profane. The former group are the veiled women, their families, the wider Roma community, refugees and migrants; and the latter are extremist organisations in other countries and Islamic governments, such as Iran and Saudi Arabia. Thus, the pro-ban stakeholders marginalized and made profane those people and organisations who wore the veil, due to their perceived association with these other categories of 'profane' actors.

It is worth noting that the intervention by the State created a dominant (pro-ban) set of perspectives as well as a subjugated (anti-ban) set, so the lack of awareness of the 'other side' can be seen as a symptom of this domination – those aligning with the government's position had no need to think about alternatives, while those with the subjugated perspectives couldn't avoid awareness of both sides, as the 'other side' (made up of the pro-ban perspectives) was cemented into legislation that they disagreed with.

Also, worth noting is the fact that the anti-securitists tried to marginalize the pro-ban people and make them profane, as those pro-ban people were viewed as pawns in the hands of opportunistic politicians. Moreover, some anti-securitists marginalized the Roma minority in Bulgaria for (in the eyes of the anti-securitists) wearing the face-veil without understanding its meaning, and some attributed monetary motivations to Roma (the desire for funding from foreign

governments), despite there being no evidence at all in my interviews with Roma that money was a consideration.
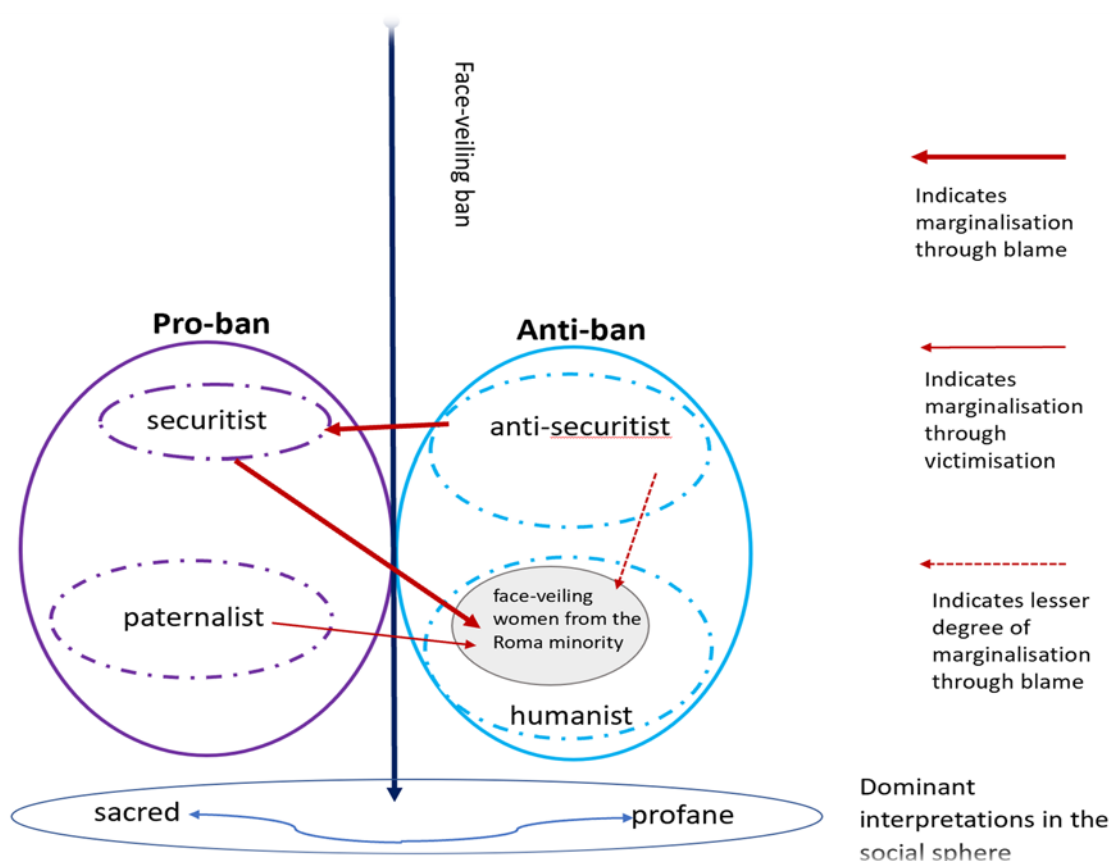
Figure 9.1. Identity and marginalization model.

Thus, some anti-securitists marginalized and blamed the Roma in a similar manner to the opposing, pro-ban camp. The anti-securitists, however, did not endorse the legislation. Lying behind this is the fact that the marginalization undertaken by the anti-securitists has a slightly different framing to it compared with the views of the securitists, evidenced in two ways. First, from the perspective of the anti-securitists, some profane acts (such as violent crimes) should be banned and some (such as the use of symbols of dress) should not, depending on whether harm is done. Second, the anti-securitists distinguished between the Roma and the pure act of face-veiling. Thus, the *act* in their eyes

should not be banned, while Roma people were profane in the eyes of some anti-securitists, whether or not they converted to Islam.

Although face-veiled women and those people who supported others in wearing the veil also aligned against the ban, they were humanists and did not join the anti-securitists in seeking to profanitize the securitists. They only complained about their own marginalization and profanity in the eyes of others.

All the face-veiled women supported the humanist sub-perspective that everyone should be free to wear what they wish. Perhaps this was due to their subjugated position, because they had been legislated against. The face-veiled women had experienced marginalization first-hand, and they shared traumatic experiences and the general feeling of victimhood. There is a possibility that these people would have formed another perspective if they were in a different position in the power spectrum; e.g. if they were in a highly conservative Islamic country where the veil is considered normal, would they still have argued for freedom of choice? Likewise, what if the intervention had been different – say, the use of the LGBTQ+ rainbow flag was banned? Would the humanists in my sample have taken a stance alongside gay activists? These are questions that strike to the heart of whether the humanist argument is really one that would be universally applied by its advocates, or whether it is more of a locally-relevant justification used in response to the experience of marginalization. However, these questions cannot be answered based on my current data set and would require further research to address.

3. What is the role of regulation in identity formation?

This research question is closely linked with the previous one, so the answer comes in the form of a continuation of the previous paragraphs, although at the time of formulating the questions, I was not aware that numbers 2 and 3 were so intimately connected. I had intuitively arranged them in this manner. Marginalization as a systemic process resulting from boundary judgments was my first line of questioning, while institutional thinking felt like a subsidiary inquiry.

However, I have not gone back and retrospectively framed question 3 as a sub-question of question 2 because I believe that looking at the role of institutions and regulation deserves to be examined in its own right. My BATWOVE analysis revealed that people either aligned themselves with the ban or opposed it. The existence of the ban had given rise to the existence of all four perspectives discussed earlier. As a moral referent, the ban served to prompt the value judgements of my respondents. Thus, I conclude that formal institutions are critical in identity formation – the attitude one has towards them also plays an influential role in boundary judgements.

I applied the theory of marginalization to the Bulgarian case-vignette. In this sense, I have studied how institutions make a sacred or profane interpretation of a phenomenon dominant, and thus I am introducing legislation as a new dimension in Midgley's (1992, 2000) marginalization theory. Midgley reviews the importance of rituals in marginalization processes, and in our correspondence has explained the role of imagery too (Midgley 2019a). From my conversations, it transpires that the law has generated new rituals – the searches and fines that are imposed upon Muslim women are exemplary of this. Additionally, the law has generated other rituals and forms of resistance – some women take their veils off when entering the city, and when the police come to their neighbourhood, as the law was applied strictly in the first 6 months and afterwards there have been fewer checks. Women see the inside of their village as a private sphere, and the outside as public.

However interesting these new rituals may be, my thesis particularly scrutinises the role of the law in attributing profanity. The process of assigning profanity is justified by an alleged infringement of sacredness. The motives published along with the bill, for example, explained a series of supposed threats experienced by Bulgarians – the post-Arab Spring migration, the new forms of Islam that had entered, the influence of foreign countries, and extremist organisations (Bill 654-01-58, 2016). Thus, by attributing profanity, the legislators were seeking to restore sacredness to the Bulgarian non-Muslim population, and indeed a sense was given by my pro-ban respondents of a return to normalcy and a liberation from external influences on the social system. It seems that in times of conflict the sacred-profane binary resurfaces. In Figure 2, I demonstrate how the face-veiling ban

brought issues from beyond the legal system, that once had an invisible status, into the margins of the legal system where they were attributed profanity.
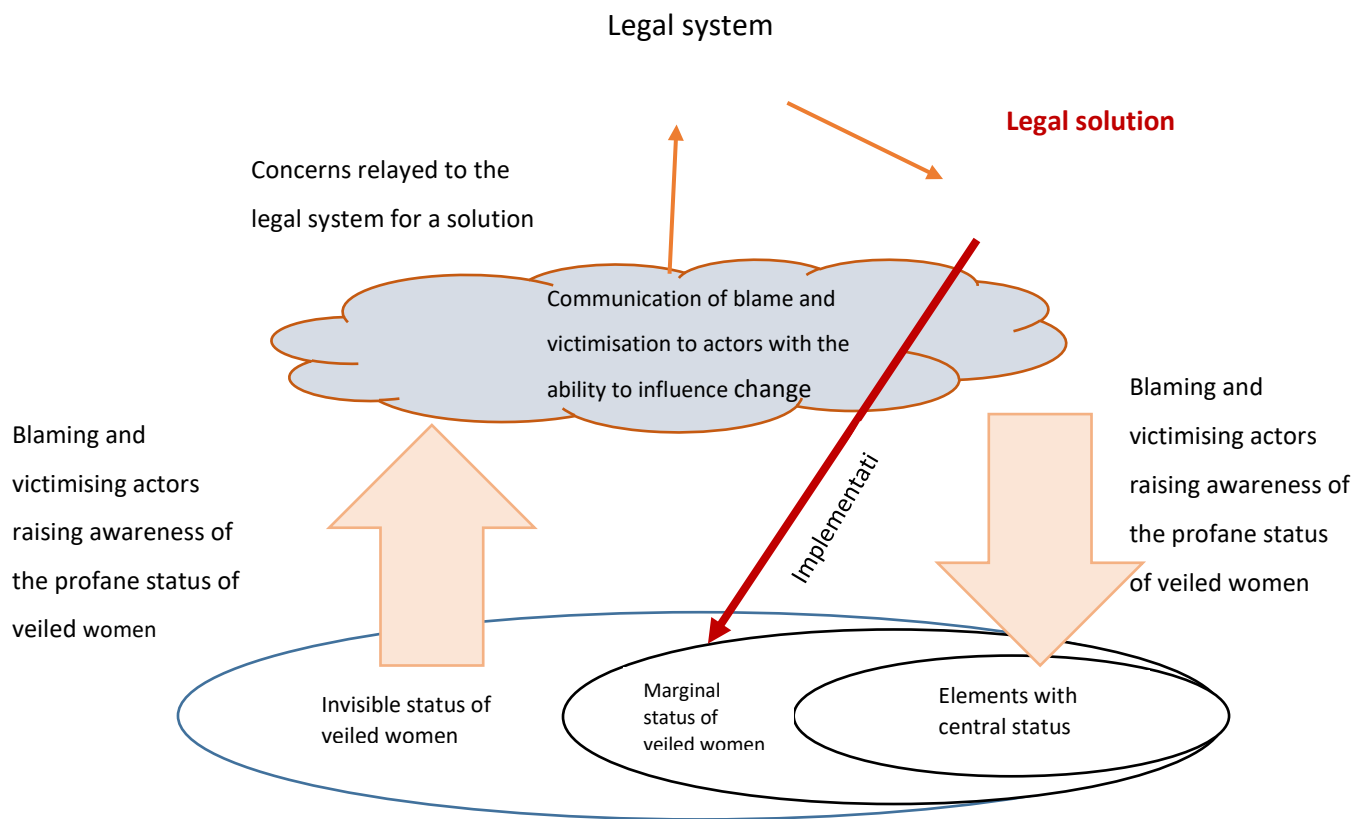
Legal system

Legal solution

Concerns relayed to the
legal system for a solution

Communication of blame and
victimisation to actors with the
ability to influence change

Blaming and
victimising actors
raising awareness of
the profane status of
veiled women

Blaming and
victimising actors
raising awareness of
the profane status
of veiled women

Implementati

Invisible status of
veiled women

Marginal
status of
veiled women

Elements with
central status

Figure 9.2. Legal intervention attributing a profane status.

In the case of the veil, as I have argued on numerous occasions throughout this thesis, the political actors who fuelled the anti-burqa campaign and designed the ban, won considerable support in the elections that followed, and are now part of the coalition government. Blame, as I have asserted in the previous chapter, had an important role in the marginalization dynamic that allowed the veil to become profanitized and the Nationalist Party to become sacralised. A similar process can be observed in other transformations that involve legal frameworks.

For instance, the Brexit campaign brought some political actors who were marginal (like Nigel Farage and his UKIP Party) to the centre stage of the political

system (in this case his Party didn't become part of the government, but pressuring that government into a referendum against their will is surely evidence of centrality in the political discourse of the time). This was achieved through campaigns involving marginalization, where the EU, its citizens and the rules and ideas it represents were blamed and disparaged as harmful to the United Kingdom. I believe that extending the domain of application of Midgley's marginalization theory to evaluation of the political campaigns behind legislative processes could illuminate interesting new marginalization dynamics. This could be a subject for future research.

4. What are the policy implications of my investigation?

Overall, my findings indicate that people who had previous experiences of marginalization felt further marginalized by the ban: Muslim people who were subjected to Islamophobic abuse and/or Roma people expressed a feeling of victimisation and blame. In the course of my data collection, I started thinking that Muslim groups spoke of each other, sometimes without having had personal inter-group experiences. People who either condemned or condoned the face-veil mostly never came close to a veiled woman. I could, of course, argue that face-veiled women are generally socially reclusive and do not seek to be in the centre of public life. However, they do not exist in isolation, but are born and marry into families, and members of these families exist in the social sphere and interact with wider society. Still, there seems to be a chasm between the veiled women and everyone else, and this chasm is full of the unknown. Who are these women, and why do they wear their veils? Very few of my respondents personally knew a veiled woman (7 out of 35) or wore a veil themselves (4 out of 35) at some point in their lives.

Additionally, face-veiled women and their families were not consulted in the process of passing the legislation (more details on their exclusion can be found in Chapter 3). The striking, contrasting interpretations of the veil revealed the lack of dialogue between people who were supporting different perspectives. Perhaps when composing public policies, the people who will be subject to an intervention

should be consulted? I am proposing this, thinking that those drafting legislation regulating forms of identity-related behaviour should be more participatory in their approach, so negative side-effects that only some stakeholders may be aware of can be anticipated and addressed. This remains a tentative suggestion (note that the sentence before last was phrased as a question) because, if one would pursue a stronger universal position, then murderers, rapists and paedophiles would also have to be invited to discuss legislation and penal measures, which would indicate the negotiability of societal norms that are almost universally agreed upon, and are foundational to the preservation of human life and mental health. Those who commit serious crimes like this arouse deep emotions, and it would be widely perceived as socially unacceptable to consult such criminals on the ways in which their crimes should be viewed and treated.

A whole new avenue to explore, that runs parallel to my research, is the need to evaluate legislation that sanctions other non-violent identity expressions. To date, no such study in Bulgaria exists. A suitable format of evaluation would be workshops, organised as systemic interventions, where key stakeholders are invited to reflect on their boundary judgements. Given that I may be dealing with serious forms of marginalization, separate stakeholder groups would be needed, at least initially, so people could develop their views outside the hearing of others. I believe that the work of Williams and Imam (2006), as well as Midgley's (2000, 2016, 2019b) extensive practice-informed research, may provide a useful set of systemic approaches for evaluative interventions. I will return to these ideas in the *Future directions* section of the present chapter.

The present research also offers a contribution perhaps more common for PhD projects in social science. I have engaged participants from a wide spectrum of Muslim minorities, who were not consulted at the time of designing the ban. It is not customary to consult citizens in the Bulgarian legislative process. The exclusion of citizens' views in the design of legislation is a matter that I intend to turn my attention to at a later date. For now, I simply offer my interpretation of the views of Muslim citizens on the Bulgarian burqa ban.

Limitations

The present PhD project has not been without its limitations. The limitations I have identified are primarily resource-related, concerning time and money. Naturally, my own mental resources and capabilities of creating a new cultural product, such as a PhD thesis, should also be factored in too. However, since I was awarded a University of Hull scholarship, and have been gently and generously supported by my supervisors, I do have some confidence in claiming that, given more time and money, these limitations could have been overcome. Although my supervisors and I aspired to investigate systemic processes of identity, we were constrained by our own environment. The PhD funding lasted for three academic years. There was no financial allowance for traveling or data collection. Thus, I had to organise my visits to Bulgarian cities according to my own budget.

Talking to more people in more locations would surely have brought more insights to my research, but it was not possible to spend more time and resources on data collection. More particularly, from a systemic point of view, it would have been better to have accessed non-Muslims as well as Muslims. Since society is a system consisting of different groups and worldviews, it would have been meaningful to enrich my systemic reflections with conversations with non-Muslim participants. Perhaps this could have illuminated other marginalization dynamics.

Nevertheless, given the number of conversations it was possible to have within the time available, I made the judgement that it would be most important to reach as many as possible of those who had not been consulted during the writing of the legislation. I did actually undertake a brief stakeholder analysis early on, with the support of my supervisors, but this revealed that there were so many different categories of non-Muslim stakeholders that it would not be possible to reach most of them in addition to a diverse selection of Muslims.

Another limitation I found is the time constraint on the project itself. This is natural, as all degrees, even postgraduate research ones, must end within a time frame. That is why my research is also bound by the zeitgeist of 2016-2019, and all the international and national events that had contributed to it. Many reports have provided evidence that veiled women in Muslim minority countries suffer verbal and sometimes physical abuse from strangers (Bouteldja, 2015; Alimahomet-

Wilson, 2017). In Bulgaria in 2017, a young woman in a hijab was expelled from school under the pretext that her scarf did not fit with the school's internal rules; while her father lost his case at the Supreme Administrative Court, the family decided to take the matter to the European Court for Human Rights (Bairakli and Hafez, 2018). A similar case of unacceptability of the veil was the reluctance of education workers to allow a scarfed teenager to sit for her final exams that would determine her ability to receive university education (Bairakli and Hafez, 2018). This young woman was forced to wear a wig and attended without her scarf (ibid). These cases, coupled with the banning of the veil that some other countries had already adopted, were concerns of all the face-veiled women I spoke with, and of some of the hijab-wearing ladies.

At the present time, I am writing up during the covid-19 pandemic. From what I am hearing from Bulgaria, it seems that public attitudes towards the face-veil, and more specifically its acceptability, have changed, given that many people now wear masks to protect against the virus. Likewise, there are reports from the UK that veiled women are encountering less discrimination during the pandemic because now most people understand the drive to protect one's body, for one reason or another (Piela, 2020). I assume that, if I had commenced my research in 2020, many of my respondents may have said different things.

Future directions

I see the limitations of my analysis as suggesting new avenues for research. There are many things that I would have done differently or additionally if I had had more funded time to return to my respondents. One main regret I have is not exploring the rigidity of every perspective in terms of what they make of 'the other' opposite camp. These comments might have revealed how the logic of each camp is self-sealing – an important element of many systemic analyses.

Some of my respondents commented on the views of the opposing camp, but these aspects of the conversations could have been explored in more detail. This is crucial to further developing my systemic identity model. As of now, I am only able to see that the camps are defined in oppositional relation to each other, and I do

not see all the subtleties of their interactions. In my future explorations, I would cherish the opportunity to investigate the mechanisms of tension between the perspectives and the particular ways in which they mutually attribute profanity (or not, in the case of the humanists). In the same vein, it would be interesting and meaningful to extend my reflections to non-Muslims from Bulgaria. Hopefully, in the future, I will be able to obtain the resources to organise a new research trip to accomplish this.

Another likely avenue for future research is, of course, a different State-led intervention aimed at identity, where domination and subordination interplay. In the current thesis, the legislation I studied prohibits the veiling of the face, and its raison d'être is Islam in Europe. Yet, a law could be targeting any expression and the identity it is associated with (e.g. the rainbow flag for LGBTQ+ people, sports club jerseys, other ethnic outfits such as traditional attires). Expressions of an identity could also cover behaviours. For instance, affectionate behaviour between LGBTQ+ people could well be the subject of legislation, as LGBTQ+ identity could receive formal profane framing from the State.

Sometimes identities are associated with events. At the beginning of 2020, following a Supreme Court Decision, the Bulgarian State banned the annual 'Lukov Marsh' (Nova TV, 2020). 'Lukov Marsh' (http://www.lukovmarsh.info/) is a civil-led manifestation organised by right-wing supporters in the memory of General Lukov, who held close ties with the Third Reich and enabled the extermination of ethnic minorities and opposition members in the 1940s. Like the veil, the State is framing the event as profane, and hence it would also provide an interesting field of study. Numerous other cases where the State intervenes to cement a reading of the sacred and the profane, are, of course found in penal legislation, and my future research could also extend to other areas of jurisprudence that do not specifically target identity and its expressions.

The theory of value conflict (Midgley, 2000; Yolles, 2001; Midgley and Pinzón, 2011) illustrates the diversity of stakeholder value judgements that are generated by the same phenomenon. Diverse interpretations are informed by diverse values (Midgley, 2016). When values are not aligned and purposes diverge, value conflict

is present. Three types of actions should be considered when intervening in value conflict:

> "[s]upporting people in transcending overly narrow value judgements about what is important to them; seeking to widen people's boundaries of the issues that they consider relevant; and attempting to challenge stereotyping and stigmatisation by building better mutual understanding" (Midgley, 2016, p.4).

In his later cogitations on the subject of value conflict, Midgley (2019b) introduces strategies for intervention in marginalization dynamics. These strategies include:

> "amplify marginalized voices and create empathic connections; demonstrate the connections between the foci of different people to blur the primary boundary; unite against a common enemy; and finally, undermine negative stereotypes and transcend narrowly defined boundaries" (Midgley, 2019b, slide 16).

The kernel of Midgley's argument can be found in Galtung's (1999) 'transcend' method. Transcending narrowly defined boundaries and discovering overlaps of concern and responsibility have also been Galtung's focus (Galtung, 1999), and consequently his approach was adopted by UNDP as a training tool for disaster management.

While I would have cherished the opportunity to engage with my participants and to intervene in marginalization dynamics in a systemic way, my time and resources were limited. As I elaborated in the previous section, the main issue between the perspectives was the lack of awareness of their diversity, and consequently, the lack of dialogue between them. This opens the question of how to raise awareness of other alternative viewpoints, or how to amplify marginalized voices (Midgley, 2019b, slide 16). Still, Midgley's (2019b) intervention strategies present new avenues to extend my own work on identity formation. I do hope that, in the future, I will have the opportunity to apply these strategies and evaluate their effects in a longitudinal study. Building empathy is important because, if the pattern of relationship between perspectives is marginalization rather than just conflict, those with the dominant perspective may feel justified in disregarding the humanity of the other (Midgley, 2019a).

Conclusion

I approach the final section of this thesis with a mixture of emotions. I feel grateful for the generous support of my supervisors. My writing style and thought processes have been carefully nurtured by my supervisors, and my overall research skills have improved dramatically since four years ago, when this journey began. I believe I have completed the quest I set out at the start of my journey - via my research questions. On the one hand, I feel happy – my knowledge and understanding of systemic theories in practice has grown immensely. I also feel at peace for having expressed all the thoughts that I felt were relevant and important to the topic, for learning how to apply systemic theories to practical situations, and for seeing their illuminating power. On the other hand, I feel that my efforts to contribute to the debates on relational identity, marginalization and the evaluation of interventions are far from closure.

My work offers two methodological contributions: on the use of BATWOVE for knowledge production and the sequencing of the elements of BATWOVE. First, BATWOVE may be applied as a retrospective framework for identifying structured themes in transcripts. Checkland (2015) asserts that SSM can be used for knowledge production, and in this sense, I have followed his original intention. The novelty in my approach is in the application of BATWOVE to look at a legislative transformation and the perspectives on it. Thus, I believe that this approach to evaluating stakeholder perspectives can be meaningful in relation to other legal interventions. It could be especially useful more generally when applied to evaluating liminal states initiated by powerful actors such as the State or political players. However, BATWOVE can also be applied to transformations where there is no clear owner or actors – my analysis revealed that the BATWOVE is useful even on occasions when ownership and other stakeholder roles are not clearly defined.

Second, my analysis revealed the crucial importance of perceptions of environmental constraints – respondents would justify their worldviews through reflections on their socio-economic and ecological environments, and what is or is not changeable within them. Thus, my recommendation for SSM practitioners is to follow the TWE framework, where the transformation is followed by the

worldview (Checkland, 1981; Midgley and Reynolds, 2001, 2004), but with environmental constraints immediately after worldview. The ordering of the rest of the framework, the BVOA, may take different forms, depending on the particular application. In the case of my PhD, I was mostly interested in the dynamics between beneficiaries and victims, hence I followed BV OA. However, if my focus was on the owner, it would have been OBVA, etc. The key point to take home is that perceptions of environmental constraints are intimately related with worldviews and overall value judgements.

Additionally, this work represents a contribution to the field of systemic identity theory. I have introduced a question about whether communitarian identity theorists are right to so strongly emphasise the influence of collective values in identity formation. Unfortunately, because I used a small-sample, exploratory research design, and Dick's (1999) technique of getting interviewees to recommend others with different views (which might have inflated the variety of perspectives uncovered compared with a random sample), it is not possible to do more than raise a question about this – it would require more research, without these limitations, to provide a firm answer.

Moreover, I have questioned whether such a thing as collective values exist in the homogenous way some writers treat them: while my respondents did refer to collective values, their interpretations of collective understandings of right and wrong differed considerably. The divisions among my respondents appeared to be systemically related to one another – they were informed by a contrasting interpretation of what is right and wrong, what it means to be a Bulgarian Muslim and whether the State is a credible source of legitimacy.

By applying Midgley's (1992, 2015) marginalization theory, I also extended his work to the context of State-led interventions and discovered that they can be a source of systemic divisions and marginalization. The theory of marginalization hinges on the dynamics between two competing perspectives. Indeed, two competing perspectives on the face-veil ban did emerge from my data – the pro-ban and anti-ban camps. These camps represent two different boundary judgements: according to the pro-ban stakeholders, face-veiling as a social ritual, the people who practice it and the countries where it is traditionally worn, are

profane. The anti-ban camp upholds that the face-veil, the people who wear it and the countries that allow it are on a spectrum running from sacredness to normality.

Within those two opposing camps, however, I identified two more competing perspectives. Some people from the anti-ban camp marginalized and profanitized the face-veiling Romas, who were the largest directly-affected group of stakeholders. Anti-securitists blamed Roma people, while at the same time upholding the position that a ban like this should not be imposed. All the anti-securitists also expressed profanitizing value judgements against the State. Interestingly, some anti-securitists also profanitized the people who support the ban and are against the face-veiling Roma minority.

Both humanists and anti-securitists are opposing the ban, thus belong to the same wider boundary judgement. Some representatives from the anti-securitist camp vocally marginalized Roma, not face-veiling per se. This means that two perspectives that differ dramatically in their values can sit within the same wider boundary judgement (Figure 9.1). Moreover, since the anti-securitists and pro-ban respondents had differing views on the legislation, despite being united in marginalizing the Roma minority, this illuminates that the precise framing being used by people is crucial when evaluating the legislation that cements marginalization in place: the anti-securitists distinguished between acts that directly caused harm (such as violent assaults) and acts that were symbolic (such as wearing a veil), while the securitists and paternalists both viewed the veil as harmful due to its perceived association with both the profanity of Roma and illegitimate foreign influences.

Arguably, the kind of marginalization of face-veiled Roma that is associated with perceived harm is going to be deeper than a general dislike of Roma where no harm requiring legislation is perceived (although, from the humanist perspective, no marginalization is justified in the context of Roma). In my view, a move towards a more spectral approach, going beyond the sacred and profane as a present/absent binary, would serve a better understanding of marginalization.

In my thesis, I endeavoured to inquire into the systemic effects of the anti-veiling legislation. I met and spoke with Bulgarian Muslims of Turkish descent, Pomaks and Roma. I met ethnic Bulgarian converts and migrants of Arabic descent. The

experience of recruiting participants and leading a discussion on the ban was challenging and enriching. The reader might not know this, but I am a rather impatient person, and I easily become anxious or agitated. I learned how to be patient with respondents and how to reassure them during our discussions. This work fostered my patience and helped me cultivate a calmer approach. I believe I have evolved, both professionally and personally, and this has happened while I have been constructing the theoretical spine of this thesis, as well as during my systemic reflections on the literature, my fieldwork and data. Thus, I feel that this PhD, aside from the methodological and theoretical contributions discussed above, has also brought a palette of personal contributions too. I have now started my first full-time lecturing role and am looking forward to engaging in the next stage of my research journey.

References

24 hours (2010) 'Islamist radical forces scarves upon women'. *24 hours.* 12/07/2010. 24 часа (2010). Ислямски радикалист кара жени да носят забрадки. *24 часа 12/07/2010.* Available online at https://www.24chasa.bg/Article/542164 accessed 04/08/2017

Abrams, D., & Hogg, M. A. (1998). *Social identifications: A social psychology of intergroup relations and group processes.* London: Routledge.

Ackoff, R. L. (1974). *Redesigning the future.* New York: John Wiley & Sons, Ltd.

Ackoff, R. L. (1979). The future of operational research is past. *Journal of the operational research society*, *30*(2), 93-104.

Ackoff, R. L. (2001). A brief guide to interactive planning and idealized design. *Retrieved on March 19*, 2006.

Alimahomed-Wilson, S. (2017). Invisible violence: gender, islamophobia, and the hidden assault on US Muslim women. *Women, Gender, And Families Of Color*, *5*(1), 73-97.

Amiraux, V. (2013). The 'illegal covering' saga: what's next? Sociological perspectives. *Social Identities*, 19(6), 794-806.

Amiraux, V. (2016). Visibility, transparency and gossip: How did the religion of some (Muslims) become the public concern of others? *Critical Research on Religion*, 4(1), 37-56

Ananiev, K. (2020). *Public ordinance no 01-197/11.04.2020.* Available at https://www.mh.government.bg/media/filer_public/2020/04/11/zapoved_ _rd-01-197-11042020.pdf

Anev, Y. (2017). 68 Undocumented Foreigners Removed since January 2017. *Actualno. com.* 68 незаконно пребиваващи чужденци са изведени от

България от началото на 2017 г. Available at https://www.actualno.com/europe/68-nezakonno-prebivavashti-chujdenci-sa-izvedeni-ot-bylgarija-ot-nachaloto-na-2017-g-news_588934.html?utm_source=direct&utm_medium=text_europe&utm_campaign=in_article_link2 Accessed 20/08/2019.

Angelov, K. (2020). *Public ordinance No 01-609/ 21.10.2020*. Available at https://www.mh.government.bg/media/filer_public/2020/10/21/zapoved_ob6ti_merki_21_10_20_1.pdf

Angelov, P. (2013). *The Bulgarian Middle Ages. [Българско Средновековие]*. Sofia: Polis.

Angelova, S. (1980). Early Slavonic Culture North and South of the Danube between the 7th and the 8th Century, *Archaeology, (12)*. По въпроса за раннославянската култура на север и на юг от Дунав през VII-VIII в. *Археология* (12).

Arcury, T. A., & Quandt, S. A. (1999). Participant recruitment for qualitative research: A site-based approach to community research in complex societies. *Human Organization*, 128-133.

Ares, E. and Sutherland, N. (2019). *Consumption of dog meat in the UK*. Debate Pack. House of Commons Library. Number CDP 2019/0045. Available at https://commonslibrary.parliament.uk/research-briefings/cdp-2019-0045/

Avramov, R. (2016). *The Economics of the Revival Process. [Икономика на "възродителния процес"].* Sofia: Helikon.

Baeva, I. and Kalinova, E.(2009). *The Revival Process: Bulgarian Statehood and the Bulgarian Turks (1930s-1990s).* State Agency Archive. *Възродителният процес: Българската държава и българските турци*

(средата на 30-те - началото на 90-те години на XX век). Държавна Агенция „Архиви".

BAN (1991). *A History of Bulgaria: Volume VII – 1878-1903*: Restoration and Stabilisation of the Bulgarian State. История на България. Том 7: Възстановяване и утвърждаване на Българската държава. Националноосвободителни борби 1878-1903 Sofia: BAN.

Bancroft, A. (2005). *Roma and Gypsy-Travellers in Europe: modernity, race, space and exclusion.* Aldershot: Ashgate.

Bandura, A., and Walters, R. H. (1963). *Social learning and personality development.* New York: Holt, Rinehart and Winston.

Barany, Z. (2001). Romani electoral politics and behaviour. *JEMIE - Journal on ethnopolitics and minority issues in Europe*, 1, 1-12

Bartlett, F.C. (1932) *Remembering.* Cambridge: Cambridge University Press.

Bateson, G. (1960). Minimal requirements for a theory of schizophrenia. *AMA Archives of General Psychiatry*, *2*(5), 477-491.

Bateson, G. (1972). The logical categories of learning and communication. *Steps to an Ecology of Mind*, 279-308.

Bayat, A. (2005). Islamism and social movement theory. *Third World Quarterly*, 26(6), 891-908.

Bayraklı, E., & Hafez, F. (Eds.). (2018). *European Islamophobia Report: 2017.* Seta. Available at http://www.islamophobiaeurope.com/wp-content/uploads/2018/04/Bulgaria.pdf [Accessed 01.04.2020].

Beer, S. (1972). *Brain of the firm: the managerial cybernetics of organization.* Wiley.

Beer, S. (1979). *The heart of enterprise* (Vol. 2). John Wiley & Sons.

Beer, S. (1985). *Diagnosing the system for organizations*. John Wiley & Sons Inc.

Benhabib, S. (1992). *Situating the self: Gender, community, and postmodernism in contemporary ethics*. Psychology Press.

Bergson, H. (1911). Creative Evolution, trans. Arthur Mitchell. *New York: Henry Holt.*

Bernstein, B. (1964). Elaborated and restricted codes: Their social origins and some consequences. *American Anthropologist*, 66(6), 55-69.

Bertalanffy, L. von (1945). Zu einer allgemeinen Systemlehre. *Blatter fur Deutsche Philosophie* Vol. 18, 1945; extract in Biologia Generalis, Vol. 19, pp. 114-129, 1949. Reprinted in Bertalanffy, L. von (1968) *General System Theory, Foundations, Development, Applications*. New York: George Braziller.

Bezlov, T., Dimov, M., Yordanova, M., Gunev, F. (2010). *Полицейски проверки и използване на етнически профили в България* [*Police Checks and the Use of Ethnic Profiling in Bulgaria*]Sofia: Centar za Isledvane na Demokratsiyata.

Bhaskar, R. (1986) *Scientific Realism and Human Emancipation*. London: Verso.

Biernacki, P., & Waldorf, D. (1981). Snowball sampling: Problems and techniques of chain referral sampling. *Sociological Methods & Research*, 10(2), 141-163.

Bobchev, S.S. (1928). Bulgaria under Tsar Simeon (I.). *Slavonic and East European Review*, *7*, 621.

Bouteldja, N. (2015). Behind the Veil: Why 122 Women Choose to Wear the Full Face Veil in Britain. *Open Society Foundations: New York, NY, USA.*

Boyd A., Brown M. and Midgley G., (2004). Systemic Intervention for Community OR: Developing Services with Young People (Under 16) Living on

the Streets. In, *Community Operational Research: OR and Systems Thinking for Community Development.* Midgley, G. and Ochoa-Arias, A.E. (eds.). Kluwer, New York.

Braun, V., & Clarke, V. (2006). Using thematic analysis in psychology. *Qualitative Research in Psychology, 3*(2), 77-101.

Brearley, M. (2001). The persecution of Gypsies in Europe. *American Behavioral Scientist, 45*(4), 588-599.

British Sociological Association. (2002). *Statement of ethical practice for the British Sociological Association.* British Sociological Association.

Brown, A.D. (1997). Narcissism, identity, and legitimacy. *Academy of Management Review,* 22(3), 643-686.

Brown, G. S. (1969). *Laws of form* (pp. 123-124). London: Allen & Unwin.

BTV (2016). *The Koran does not mention any burqas.* https://btvnovinite.bg/tazi-sutrin/razgovori-s-gosti/aleksandar-aleksiev-v-korana-nikade-ne-se-sreshta-dumata-burka-kamo-li-prinuda-da-se-nosi.html

Buchanan, A. (1978). Medical paternalism. *Philosophy & Public Affairs,* 370-390. Bulgarian Helsinki Committee (2018). *Human Rights in Bulgaria in 2018.* [*Правата на човека в България през 2018 г*]. Sofia: Bulgarian Helsinki Committee.

Bulgarian National Assembly (2016). *Bill 654-01-58/20.04.2016.* Available at http://www.parliament.bg/bg/bills/ID/42106

Bulgarian Parliament (1973/2016). *Legislation Act.* Sofia: State Gazette.

Bulgarian Parliament (1990/2020). A*dministrative Violations and Penalties Act.*

Bulgarian Parliament (2015). *National strategy to counter radicalisation and terrorism.* Available online http://www.strategy.bg/publicconsultations/View.aspx?lang=bg-BG&Id=1771 [Accessed 01/12/2015].

Bulgarian Parliament (2016). *Act Limiting Garments Partially or Fully Covering the Face.* Sofia: State Gazette.

Bulgarian Parliament (2016a). *Report of the Religious Denominations and Human Rights Committee*, 26/05/2016.

Bulgarian Parliament (2016b) *Report of Regional Policy, Public Works and Local Self-Government Committee*, 12/05/2016.

Bulgarian Parliament (2016c). *Report of the Legal Affairs Committee,* 26/05/2016

Bulgarian Parliament (2016d). *Internal Security and Public Order Committee report*, 01/06/2016

Bulgarian Parliament (2019). *Code of Administrative Procedure.* Sofia: State Gazette.

Bulgarian Parliament (2020). *Code of Penal Procedure.* Sofia: State Gazette.

Burgas County Council (2016). *Public Order Ordinance*, Burgas Municipality No 12802/28.11.2016).

Burke, P. J. (1991). Identity processes and social stress. *American Sociological Review*, *56*(6), 836-849.

Burke, P. J. (1997). An identity model for network exchange. *American Sociological Review*, 134-150.

Burke, P. J., & Reitzes, D. C. (1981). The link between identity and role performance. *Social Psychology Quarterly, 44*(2), 83-92.

Burke, K. & Gusfield, J.R. (1989). *On symbols and society.* Chicago: University of Chicago Press.

Cabrera, D. A. (2006). Boundary critique: A minimal concept theory of systems thinking. In *Proceedings of the 50th Annual Meeting of the ISSS-2006, Sonoma, CA, USA.*

Cabrera, D., Colosi, L., & Lobdell, C. (2008). Systems thinking. *Evaluation and program planning, 31*(3), 299-310.

Capra, F. (1996). *The web of life: A new synthesis of mind and matter.* London: HarperCollins.

Carr, E.H. (1961). *What is history?* Penguin, Harmondsworth.
Casa-Nova, M. J. (2007). Gypsies, ethnicity, and the labour market: An introduction. *Romani Studies, 17*(1), 103-123.

Checkland P, Scholes J. (1990). *Soft systems methodology in action.* Wiley: Chichester.

Checkland P. (1981). *Systems thinking, systems practice.* Wiley: Chichester.

Checkland, P. (1985). From optimizing to learning: a development of systems thinking for the 1990s. *Journal of the Operational Research Society*, 757-767.

Checkland, P. (1999). Systems thinking. In Currie, W. and Gallier B. (eds) *Rethinking management information systems,* pp 45-56. Oxford: Oxford University Press.

Checkland, P. (2000). Soft systems methodology: a thirty-year retrospective. *Systems research and behavioral science, 17*(S1), S11-S58.

Checkland, P. B. (1979). Techniques in 'soft' systems practice part 1–systems diagrams–some tentative guidelines. *Journal of Applied Systems Analysis, 6,* 33-40.

Checkland, P. S., & Scholes, B. J. (1990). *Soft systems methodology in action.* UK: John Wiley and Sons.

Checkland, P., & Poulter, J. (2006). *Learning for action: a short definitive account of soft systems methodology and its use, for practitioners, teachers and students.* John Wiley and Sons Ltd.

Cholov, P. (2008). *The Chiprovtsi uprising of 1688.* Sofia: Tangra.

Churchman, C. W. (1968) *The systems approach.* New York: Dell Publishing.

Churchman, C. W. (1970). Operations research as a profession. *Management Science, 17*(2), B-37.

Churchman, C. W. (1971). *The design of inquiring systems, basic concepts of systems and organizations.* New York: Basic Books.

Churchman, C. W. (1979). *The systems approach and its enemies.* New York: Basic Books.

Club Z (2016a). The 'Burqa Ban' is working but it requires technical time. *Club Z* 02/2/2016. Available at https://clubz.bg/47706-raboti_li_zakonyt_za_burkite_samo_malko_tehnichesko_vreme

Coleman, J. S. (1958). Relational analysis: the study of social organizations with survey methods. *Human Organization*, 17(4), 28.

Córdoba J-R and Midgley, G (2003). Addressing organisational and societal concerns: an application of critical systems thinking to information systems

planning in Colombia. In, *Critical Reflections on Information Systems: A Systemic Approach*. Cano, J. (ed.). Idea Group, Hershey.

Córdoba, J. R., & Midgley, G. (2006). Broadening the boundaries: An application of critical systems thinking to IS planning in Colombia. *Journal of the Operational Research Society, 57*(9), 1064-1080.

Crowe, M. (1996). Heraclitus and information systems. *Systemist*, 18, 157-176.

Curta, F. (2008). The making of the Slavs between ethnogenesis, invention, and migration. *Slavic and Balkan Research*, (2), 155-172.

Daskalov, R. (1998). *Between East and West: Bulgarian cultural dilemmas.* Sofia: LIK. *Между Изтока и Запада: Български културни дилеми.* София: ЛИК.

de Montesquieu, M. (1748/1984). *The spirit of laws.* North Carolina: Hayes Barton Press.

Dennews (2014). Big-scale campaign to purify radicalisation in Pazardzhik. *Dennews* 25/11/2014 *Деннюз* (2014) Мащабна акция чисти радикализацията в Пазарджик. Available online at http://www.dennews.bg/news/2014/11/25/21358-mashtabna-operaciya-chisti-pazardjik-ot-islyamizaciya-dvama-sa-arestuvani Accessed 05/08/2017.

Detrez, R. (2013). Pre-national identities in the Balkans. In R Daskalov & T Marinov (eds) *Entangled Histories of the Balkans-Volume One* (pp. 13-65). Brill.

Dewey, J. (1910) *How we think*. Boston. *MA: DC Heath*.

Di Paolo, Ezequiel A. (2005). Autopoiesis, adaptivity, teleology, agency. *Phenomenology and the Cognitive Sciences* 4, no. 4, 429-452.

Dick, B. (1999). *Rigour without Numbers: The Potential of Dialectical Processes as Qualitative Research Tools*. 2nd ed. Chappel Hill QLD: Interchange.

Dimitrov, B. (2005). *12 Myths in Bulgarian History.* Sofia: Fondatsiya KOM. *12 мита в българската история*. София: Фондация „КОМ".

Dimitrov, D. (1991). *Administrative Law.* Sofia: Ciela.

Dimitrova, A. (2016). Supreme Prosecutor officially against burqas. *Fakti.* Available online: https://fakti.bg/bulgaria/182514-cacarov-se-obavi-protiv-burkite-na-obshtestveni-mesta [Accessed 26/12/2016].

Dnes.bg (2016). Kuneva asked for a ban of burqas in schools. *Dnesbg* Available online at https://www.dnes.bg/obrazovanie/2016/04/02/kuneva-poiska-zabrana-na-burkite-v-uchilishte.298143 [Accessed 06/07/2018].

Dnesbg (2017). Dense police attendance in Sofia on May 24. *Dnesbg.* Днесбг (2017) Засилено полицейско присъствие в София на 24 май. 23/05/2017. Available online at http://www.dnes.bg/sofia/2017/05/23/v-sofiia-za-24-mai-zasileno-policeisko-prisystvie.341981
Accessed 05/08/2017.

Doctors Without Borders (2013). *Bulgaria: Syrian refugees facing appaling conditions.* Available onlone http://www.doctorswithoutborders.org/news-stories/press-release/bulgaria-syrian-refugees-face-appalling-conditions [Accessed 04/01/2016.

Doody, O., & Noonan, M. (2013). Preparing and conducting interviews to collect data. *Nurse researcher, 20*(5).
Douglas, H. (2009). *Science, policy, and the value-free ideal.* University of Pittsburgh Pre.

Douglas, M. (1966). *Purity and danger.* New York: Frederick A.

Douglas, M. (1970). *Natural symbols: explorations in cosmology.* London: Barry and Rockliff.

Douglas, M. (1986). *How institutions think.* Syracuse University Press.

Douglas, M. (1990). Risk as a forensic resource. *Daedalus*, 1-16.

Douglas, M. (1991). Witchcraft and leprosy: two strategies of exclusion. *Man, 26* (4), new series, 723-736.

Douglas, M. (1992). *Risk and blame: essays in cultural theory*. London: Barry and Rockliff.

Douglas, M. (1999). Four cultures: the evolution of a parsimonious model. *GeoJournal, 47*(3), 411-415.

Douglas, M. (2004). *Natural symbols: Explorations in cosmology*. London: Routledge.

Dougas, M. (2007). *A history of grid and group cultural theory.* Toronto, Canada: University of Toronto. *http://projects. chass. utoronto. ca/semiotics/cyber/douglas1. pdf.*

Douglas, M., & Wildavsky, A. (1983). *Risk and culture: An essay on the selection of technological and environmental dangers*. California: University of of California Press.

Drumeva, E. (2013). *Constitutional law*. Sofia: Ciela.

Duffy, K. (1995*) Social exclusion and human dignity in Europe*. Strasbourg: Council of Europe

Duma (2020). 60 people are fined for not wearing a face covering. *Duma.* Available at https://duma.bg/60-dushi-sa-globeni-za-nenosene-na-maski-v-molovete-n225083

Dupuy, J.P. (1988). On the supposed closure of normative systems. In, Teubner, G. (ed.). *Autopoietic Law: A New Approach to Law and Society*. De Gruyter, Berlin.

Durkheim, E. (1915). *The elementary forms of the religious life*, trans. Joseph Ward Swain (New York, 1915).

Dworkin, G. (1972). Paternalism. *The Monist*, pp 64-84.

Dworkin, G. (1988). *The theory and practice of autonomy*. Cambridge University Press.
Dworkin, G. (2005). Moral paternalism. *Law and Philosophy*, 24(3), 305-319.
Dworkin, R. (1986). *Law's empire*. Harvard: Harvard University Press.

Elchinova, M. (2005). Alien by default. the identity of the Turks of Bulgaria at home and in immigration in R. Detrez and P. Plas (eds.), *Developing Cultural Identity in the Balkans: Convergence vs. Divergence* (Brussels: P.I.E.-Peter Lang),pp 87–110.

Elden, M., & Chisholm, R. F. (1993). Emerging varieties of action research: Introduction to the special issue. *Human Relations, 46(2)*, 121-142.

Elliott, A. (2013) *Concepts of the self*. Cambridge: Polity Press.
Emery, F. E. (1959). *Characteristics of socio-technical systems: A critical review of theories and facts about the effects of technological change on the internal structure of work organisations; with special reference to the effects of higher mechanisation and automation*. Tavistock Institute of Human Relations.

Emery, F., & Thorsrud, E. (1976). *Democracy at work: The report of the Norwegian industrial democracy program* (Vol. 2). Springer.

Eminov, A. (2000). Turks and Tatars in Bulgaria and the Balkans. *Nationalities Papers, 28*(1), 129-164.

Eminov, A. (2007). Social construction of identities: Pomaks in Bulgaria. *JEMIE - Journal on Ethnopolitics and Minority Issues in Europe*, Vol. 6(2), 1-25

EPHA (2019). Closing the Life Expectancy Gap of Roma In Europe: *Roma Health and Early Childhood Development Study*. European Public Health Alliance. Available at https://epha.org/wp-content/uploads/2019/02/closing-the-life-expectancy-gap-of-roma-in-europe-study.pdf

Equality and Human Rights Commission (2012). *What equality law means for you as an education provider–further and higher education.* London: EHRC.

Espinosa, A., & Walker, J. (2011). *A complexity approach to sustainability: theory and application* (Vol. 1). World Scientific.

Ethier, K. A., & Deaux, K. (1994). Negotiating social identity when contexts change: Maintaining identification and responding to threat. *Journal of personality and social psychology, 67*(2), 243.

Etzioni, A. (1993). *The spirit of community: rights, responsibilities and the communitarian agenda.* New York: Crown Publishers, Inc.

European Commission (2014). *Tackling health inequalities: EU support to improve health across all sectors of society.* Available from: https://ec.europa.eu/health/sites/health/files/social_determinants/docs/2014_ health_inequalities_informationsheet_en.pdf Accessed October 2018 (European Commission 2014

European Commission (2015). *Roma health report: health status of the Roma population. Data collection in the Member States of the European Union* (2015) Available from: https://publications.europa.eu/ en/publication-detail/-/publication/61505667-ec87

European Commission's Expert Group on Violent Radicalisation (2008). *Radicalisation processes leading to acts of terrorism.* Available online http://www.rikcoolsaet.be/files/art_ip_wz/Expert%20Group%20Report%20Violent%20Radicalisation%20FINAL.pdf [Accessed 16/12/2015].

Europol (2015). *European Union terrorism situation and trend report.* Available online https://www.europol.europa. eu/content/european-union-terrorism-situation-and-trend-report-2015

Fazey I, Schäpke N, Patterson J, Hultman J, van Mierlo B, Säwe F, Caniglia G, Wiek A, Wittmayer J, Paulina Aldunce J, Al Waer H, Battacharya N, Bradbury H, Carmen E, Colvin J, Cvitanovic C, D'Souza M, Göpel M, Goldstein B, Hämäläinen T, Harper G, Henfry T, Hodgson A, Howden MS, Kerr A, Klaes M, Lyon C, Midgley G, Moser S, Mukherjee N, Müller K, O'Brien K, O'Connell DA, Olsson P, Page G, Reed MS, Searle B, Silvestri G, Spaiser V, Strasser T, Tschakert P, Uribe-Calvo N, Waddell S, Rao-Williams J, Wise R, Wolstenholme R, Woods M and Wyborn C (2018). Ten essentials for action-oriented and second order energy transitions, transformations and climate change research. *Energy Research and Social Science*, 40, 54-70.

Feinberg, J. (1987). *Harm to others* (Vol. 1). Oxford University Press on Demand.

Fenton, S. (2016). Bulgaria imposes burqa ban – and will cut benefits of women who defy it. *Independent*, available at http://www.independent.co.uk/news/world/europe/bulgaria-burka-ban-benefits-cut-burkini-niqab-a7340601.html

Fidler, D.P. (2007a). A pathology of public health securitism: approach pandemics as security threats In: A. J. Cooper, J. J. Kirton and T. Schrecker, eds. *Governing global health: challenge, response, innovation*. Aldershot: Ashgate Publishing

Fidler, D.P. (2007b) Governing catastrophes: security, health and humanitarian assistance*. International Review of the Red Cross.* 89(866), pp.247–270.

Flick, U. (2017). *An introduction to qualitative research*. Sage Publications Limited.

Flood, R. L. (1989). Archaeology of (systems) inquiry. *Systems Practice*, *2*(1), 117-124.

Flood, R.L. and Gregory, W.J. (1988). Systems: Past, present and future. In, *Systems prospects: the next ten years of systems research*. Flood, R.L., Jackson, M.C. and Keys, P. (eds.). Plenum, New York.

Flood, R. L., & Jackson, M. C. (1991). *Critical systems thinking*. Chichester: Wiley.

Focus (2016a). Krassimir Kanev, BHK: Banning the veil in Bulgaria is an anti-Muslim act. *Красимир Кънев, БХК: Налагането на забрана за носенето на бурки на обществени места в Пазарджик е антимюсюлмански актavailable online* http://news.bnt.bg/bg/a/parlamentt-zabrani-noseneto-na-burki-na-publichni-mesta-v-blgariya Accessed 03/08/2017.

Focus (2016b). The parliament voted against the face-veil. *Information agency Focus* 30/09/2016 Фокус (2016b) Парламентът забрани носенето на бурки на обществени места'. *Фокус.* available online https://www.bghelsinki.org/bg/novini/bg/single/krasimir-knev-bhk-nalaganeto-na-zabrana-za-noseneto-na-burki-na-obshestveni-mesta-v-pazardzhik-e-antimyusyulmanski-akt/

Foote, J. L., Gregor, J. E., Hepi, M. C., Baker, V. E., Houston, D. J., & Midgley, G. (2007). Systemic problem structuring applied to community involvement in water conservation. *Journal of the Operational Research Society*, *58*(5), 645-654.

Forrester, J. W. (1961). *Industrial dynamics, 2*. Cambridge: Massachusetts Institute of Technology Press.

Forrester, J. W. (1969). *Urban dynamics*. Cambridge: Massachusetts Institute of Technology Press.

Foucault, M. (1972). *The archaeology of knowledge*. London: Tavistock Publications Limited.

Fuenmayor, R.L. (1991a). The roots of reductionism: A counter-ontoepistemology for a systems approach. *Systems Practice*, 4, 419-448.

Fuenmayor, R.L. (1991b). The self-referential structure of an everyday living situation: A phenomenological ontology for interpretive systemology. *Systems Practice*, 4, 449-472.

Fuenmayor, R.L. (1991c). Truth and openness: An epistemology for interpretive systemology. *Systems Practice*, 4, 473-490.

Gallie, D., Paugam, S., & Jacobs, S. (2003). Unemployment, poverty and social isolation: Is there a vicious circle of social exclusion?. *European Societies*, *5*(1), 1-32.

Galtung, J. (1969). Violence, peace, and peace research. *Journal of Peace Research*, 6(3), 167-191.

Galtung, J. (1999). *Conflict transformation by peaceful means: The Transcend method*. UN.

Galtung, J. (1967). On the future of the international system. *Journal of Peace Research*, 4(4), 305−333.

Gare, A. (1996). *Nihilism Inc.: Environmental destruction and the metaphysics of sustainability*. Como: Eco-logical Press

Geels, F. W. (2004). From sectoral systems of innovation to socio-technical systems: Insights about dynamics and change from sociology and institutional theory. *Research Policy*, *33*(6-7), 897-920.

Genchev, N. (2010). *Българското възраждане* (*The Bulgarian Renaissance*) Sofia: Iztok-Zapad.

Georgiou, I. (2001). The ontological status of critique. *Systemic Practice and Action Research*, 14(4), 407-449.

Gergen, K. J. (1994). *Realities and relationships*. Boston: Harvard University Press

Gerhard, S. (2004). *Why love matters. How affection shapes a baby's brain.* UK: Routledge.

Gert, B., & Culver, C. M. (1976). Paternalistic behavior. *Philosophy & Public Affairs*, 45-57.

Giddens, A. (1984). *The constitution of society: Outline of the theory of structuration.* Cambridge: Polity Press.

Giddens, A. (1990). *The consequences of modernity.* Cambridge: Polity Press.

Giddens, A. (1991). *Modernity and self-identity: Self and society in the late modern age.* Stanford university press.

Gjuselev, V. (1988) *Medieval Bulgaria, Byzantine Empire, Black Sea, Venice, Genoa.* Crailsheim: Baier Verlag.

Glaser, B. And Strauss, A. (1967). *The discovery of grounded theory: strategies for qualitative research.* Chicago: Aldine.

Goodman, L. A. (1961). Snowball sampling. *The Annals Of Mathematical Statistics*, 148-170.

Gounev, P., & Bezlov, T. (2006). The Roma in Bulgaria's criminal justice system: from ethnic profiling to imprisonment. *Critical Criminology*, 14(3), 313-338.

Grace V, Midgley G, Veth J, Ahuriri-Driscoll A (2011). *Forensic dna evidence on trial: science and uncertainty in the courtroom.* Emergent Publications, Litchfield Park AZ.

Gregory, W. J. (1992). *Critical systems thinking and pluralism: a new constellation* (Doctoral dissertation, City University London).

Gregory, W.J. (2000). Transforming self and society: A "critical appreciation" model. *Systemic Practice and Action Research*, 13(4), 475-501.

Grillo, R.D. (2003). Cultural essentialism and cultural anxiety. *Anthropological Theory*, 3(2), 157-173.

Gruev, M. (2011). *Violence, Politics and Memory.* Sofia: University of Sofia Kliment Ohridski Press. *Насилие, Политика и Памет*. София: Университетско Издателство „Св. Климент Охридски".

Habermas, J. (1984a). *The theory of communicative action*, Vol. 1. *Reason and the rationalisation of societ*y., 1, 2 vols. Cambridge: Polity Press.

Habermas, J. (1984b). *The theory of communicative action*, Vol. 2. *The critique of functionalist reason.*, 2, 2 vols. Cambridge: Polity Press.

Haley, J. (1963*). Strategies of Psychotherapy*. New York: Grune & Stratton.

Hall, A. D. (1962). *A methodology for systems engineering*. van Nostrand.

Hamilton, D. L. (Ed.) (1981) *Cognitive processes in stereotyping and intergroup behavior*. Hillsdale: Erlbaum.

Hammond, D. (2003). *The Science of synthesis: exploring the social implications of general systems theory*. University Press of Colorado, Boulder CO.

Hart, H. L. A. (1961). *The concept of law*. Oxford: Oxford University Press

Haslam, S. A., Oakes, P. J., McGarty, C., Turner, J. C., Reynolds, K. J., & Eggins, R. A. (1996). Stereotyping and social influence: The mediation of stereotype applicability and sharedness by the views of in-group and out-group members. *British Journal of Social Psychology*, *35*(3), 369-397.

Heider, J. (2012). Unveiling the truth behind the French burqa ban: The unwarranted restriction of the right to freedom of religion and the European court of human rights. *Ind. Int'l & COMP. L. Rev., 22*, 93.

Helin, J., Hernes, T., Hjorth, D., & Holt, R. (Eds.). (2014). *The Oxford handbook of process philosophy and organization studies.* Oxford University Press.

Hénaff, M. (1998). *Claude Levi-Strauss and the making of structural anthropology.* U of Minnesota Press.

Hilendarski, P. (1762). *История славянобългарска* (*Slavonic-Bulgarian History*).

Hirsch, D. (2007). *Experiences of poverty and educational disadvantage.* Joseph Rowntree Foundation.

Hogg, M. A., & Hardie, E. A. (1992). Prototypicality, conformity and depersonalized attraction: A self-categorization analysis of group cohesiveness. *British Journal of Social Psychology, 31*(1), 41-56.

Kelman, H. C. (1961). Processes of opinion change. *Public Opinion Quarterly,* 25, 57-78.

Hogg, M. A., and Turner, J. C. (1987). Social identity and conformity: A theory of referent informational influence. In W. Doise and S. Moscovici (Eds.), *Current Issues in European social psychology* (vol. 2, pp. 139-182). Cambridge, England: Cambridge University Press.

Hopkins, J.L. (2006). *The Bulgarian Orthodox Church: A socio-historical analysis of the evolving relationship between Church, Nation, and State in Bulgaria* (PhD Thesis, University of Edinburgh)

House of Commons (2011). *The Localism Act.* Available at thttp://www.legislation.gov.uk/ukpga/2011/20/contents

Howard, D. A. (2017). *A history of the Ottoman Empire.* Cambridge: Cambridge University Press.

Hristov, N., Petrova, N. & Borisov, A. (2014). Ahmed Mussa is arrested by the special forces in Pazardzhik. *BNR.* 25/11/2015. Христов, Н., Петрова, Н. & Борисов, А. (2014) Ахмед Муса Ахмед е арестуван при голяма акция на ДАНС, жандармерията и полицията в Пазарджик. *БНР.* 25/11/2014. Available online http://bnr.bg/post/100489610/golama-akcia-na-dans-jandarmeriata-i-policiata-se-provejda-v-pazardjik [Accessed 12/12/2015].

Hristova, M. (2006). *Religious movements in Bulgaria. Gates to Orthodoxy,* 19/06/2006. Христова, М. (2006) Религиозните движения в България, *Двери на православието, 19/06/2006.* Available online at accessed 04/08/2017.

Hrusanov, D. (2012). *Bulgarian administrative law. [Административно право на Република България. Обща част. (пето преработено и допълнено издание)].* Sofia: Sibi.

Hulme D, Moore K, Shepherd A. (2001). *Chronic poverty: meanings and analytical frameworks.* Institute of Development Policy and Management, International

Husserl, E. (1913). 1962. *Ideas: General introduction to pure phenomenology.*

Ignatov, V. (2017). *Хан Крум Победоносецът* [*Khan Krum – The Victor*] Sofia: Millenium.

Ilkov, V. (2019). Ahmed Musa Ahmed: from the psych ward to religious leadership of the Roma Muslims. [Ахмед Муса Ахмед – от психиатрията до религиозен водач на ромите мюсюлмани]. *24 hours.* Available at https://www.24chasa.bg/ojivlenie/article/8014150

Inalcik, H. (2013). *The Ottoman Empire: 1300-1600.* London: Hachette.

Ivetic, E. (2012). *Балканските войни* [The Balkan Wars] , Sofia: Ciela.

Jackson, D.D. (1960). The Aetiology of Schizophrenia. New York: Basic Books.

Jackson, M. (1991). The rise and decay of the socialist economy in Bulgaria. *Journal of Economic Perspectives*, *5*(4), 203-209.

Jackson, M. C. (1982). The nature of soft systems thinking: the work of Churchman, Ackoff and Checkland. *Journal of Applied Systems Analysis*, 9(1), 17- 29.

Jackson, M. C. (1985). Social systems theory and practice: the need for a critical approach. *International Journal of General Systems*, 10(2-3), 135-151.

Jackson, M. C. (1987). Present positions and future prospects in management science. *Omega*, *15*(6), 455-466.

Jackson, M. C. (1990) Beyond a system of systems methodologies. *Journal of the Operational Research Society*, 41(8), 657-668.

Jackson, M. C. (1991a). The origins and nature of critical systems thinking. *Systems Practice*, 4(2), 131-149.

Jackson, M. C. (1991b). *Systems methodology for the management sciences.* New York: Springer Science & Business Media.

Jackson, M. C. (2003) *Systems thinking: creative holism for managers.* Chichester: John Wiley & Sons, Ltd.

Jackson, M. C. (2007). *Systems approaches to management.* London: Springer Science & Business Media.

Jackson, M. C. (2019). C*ritical systems thinking and the management of complexity.* Oxford: Wiley.

Jackson, M. C., & Keys, P. (1984). Towards a system of systems methodologies. *Journal of the Operational Research Society*, *35*(6), 473-486.

Jenkins, G. M. (1969). *The systems approach*. Lancaster: University of Lancaster Press.

Kabeer, N. (2000). Social exclusion, poverty and discrimination towards an analytical framework. *IDS bulletin*, *31*(4), 83-97.

Kant, I. (1781). *Critique of pure reason*, trans. JMD Meiklejohn. New York: JM Dent & Sons.

Katz, C. (2009). Social systems: thinking about society, identity, power and resistance. *Key Concepts in Geography*, *236.*

Kelsen, H. (1934). *Reine Rechtslehre: Einleitung in die Rechtswissenschaftliche Problematik. [Pure theory of law]*. Vienna. Photomechanische Neudr. D. Ausg.

Kennedy, D. (1997). *A critique of adjudication* [fin de siècle]. Harvard: Harvard University Press.

Kets de Vries, M. F. R., and Miller, D. (1984) *The neurotic organization: Diagnosing and changing counterproductive styles of management.* San Francisco: Jossey-Bass.

Keynes, J. M. (1938). Letter to Hugh Townshend. *Moggridge, D., Hg.: The Collected Writings of John Maynard Keynes, Bd*, *29*, 293-294.

Kirk, G. S. (1951). Natural change in Heraclitus. *Mind*, *60*(237), 35-42.

Konstantinov, Y. (1997). Strategies for sustaining a vulnerable identity: the case of the Bulgarian Pomaks. *Muslim Identity and the Balkan state*, 33-53.

Kozhuharov, G. (2014) Arabist from the Sorbone analyses the books of Ahmed Mussa. *News.bg.* Available online https://news.bg/crime/arabist-ot-sorbonata-analizira-dokazatelstvata-po-deloto-za-radikalen-islyam.html [Accessed 01/12/2015].

Krassimirov, A. (2016). Bulgaria bans full-face veils in public places. *Reuters* available at https://www.reuters.com/article/us-religion-burqa-bulgaria/bulgaria-bans-full-face-veils-in-public-places-idUSKCN1201FV

Krasteva, A. (2005). *Immigration in Bulgaria.* International Centre for the Study of Minorities and Cultural Relations. *Имиграция в България.* Международен център за изследване на малцинствата и културните взаимодействия

Krasteva, A. (2006). Post-communist discovery of immigration: the case of Bulgaria. *SEER-South-East Europe Review for Labour and Social Affairs*, (02), 25-34.

Küçükcan, T. (1999). Re-claiming identity: ethnicity, religion and politics among Turkish-Muslims in Bulgaria and Greece. *Journal of Muslim Minority Affairs, 19*(1), 49-68.

Kuhn, T. S. (1962). *The structure of scientific revolutions* (Vol. 2). Chicago: University of Chicago press.

Kundani, A. (2015). *A decade lost: rethinking radicalisation and extremism.* Claystone. Available at http://mabonline.net/wp-content/uploads/2015/01/Claystone-rethinking-radicalisation.pdf Accessed 03/01/2016.

Lavrin, J. (1929). The Bogomils and Bogomilism. *The Slavonic and East European Review, 8*(23), 269-283.

Law, S. (2011). *Humanism: A very short introduction.* OUP Oxford.

Leeson, P. T. (2013). Gypsy law. *Public Choice, 155*(3-4), 273-292.

Lévi-Strauss, C. (1958). *Anthropologie structurale* (Vol. 171). Paris: Plon. [Structural Anthropology].

Lewis, B. (1958). Some reflections on the decline of the Ottoman Empire. *Studia Islamica*, (9), 111-127.

Luckett, S. & Grossenbacher, K. (2003). A critical systems intervention to improve the implementation of a district health system in KwaZulu-Natal. *Systems Research and Behavioral Science*, 20(2), 147-162.

Luhmann, N. (1986). *Ecological communication*. 1989 trans. University of Chicago Press, Chicago

Luhmann, N. (1988a). The unity of the legal system. In G. Teubner (Ed.). (1988). *Autopoietic law: a new approach to law and society* (Vol. 8). Walter de Gruyter. Pp 12-36.

Luhmann, N. (1988b). Closure and openness: on reality in the world of law. . In G. Teubner (Ed.). (1988). *Autopoietic law: a new approach to law and society* (Vol. 8). Walter de Gruyter. Pp 335-349.

Lupton, R. (2004). *Schools in disadvantaged areas: recognising context and raising quality*. LSE STICERD Research Paper No. CASE076.

M'Pherson, P.K. (1974). A perspective on systems science and systems philosophy. *Futures*, 6, 219-239.

Madzharov, M. (2015). *Eastern Rumelia*. Sofia: S.M. Staykov. *Източна Румелия*

Mahmood, M. (2004). Review Essay: Wither Political Islam? Understanding the modern Jihad, Foreign Affairs, 84 (1), 148–155.

Mahoney J. (2006). Analyzing Path Dependence: Lessons from the Social Sciences. In: Wimmer A., Kössler R. (eds.). *Understanding Change*. Palgrave Macmillan, London.

Manchev, K. (2008) *History of the Balkan National Question.* Sofia: Paradigma. *История на националния въпрос на Балканите. София: Парадигма.*

Marinov, C. (2009). *От интернационализъм към национализъм. Комунистическият режим, македонският въпрос и политиката към етническите и религиозни общности.* [From Internationalism to

Nationalism: The Communist Regime, the Macedonian Question, and Ethnic and Religious Policy] Sofia: Ciela.

Marinov, V. (1964). *The Origin of the Gagauz in Bulgaria.* [*По въпроса за произхода на гагаузите в България*]. Sofia:BAN.Marinov, V. (1988). *A Visit to the Besarabian Bulgarians. Sofia: BAN. На гости у бесарабските българи.* София: БАН.

Marushiakova, E. & Popov, V. (2000) *Циганите в Османската империя* [*The Gypsies in the Roman Empire*] Sofia: Litavra.

Marushiakova, E., & Popov, V. (2015). The First Gypsy/Roma Organizations, Churches and Newspapers. *From Dust to Digital: Ten Years of the Endangered Archives Programme. Cambridge UK: Open Book Publishers*, 189-224.

Mastana, S. S., & Papiha, S. S. (1992). Origin of the Romany gypsies—genetic evidence. *Zeitschrift für Morphologie und Anthropologie*, 43-51.

Matthews, D. (2004). *Rethinking systems thinking: Towards a postmodern understanding of the nature of systemic inquiry.* Adelaide: University of Adelaide PhD thesis.

Maturana, H. R. (1981). Autopoiesis. In: Zeleny M. (ed.) *Autopoiesis: A theory of the living organization.* Westview Press, Boulder CO: 21–33. Available at http://cepa.info/557

Maturana, H. R. (1988). Reality: The search for objectivity or the quest for a compelling argument. *The Irish Journal of Psychology*, *9*(1), 25-82.

Maturana, H. R., & Varela, F. J. (1987). *The tree of knowledge: The biological roots of human understanding.* New Science Library/Shambhala Publications. Maturana, H. R., & Verden-Zöller, G. (2008). *The origin of humanness in the biology of love.* Imprint Academic.

Maturana, H., Mpodozis, J., & Letelier, J. C. (1995). Brain, language and the origin of human mental functions. *Biological Research*, *28*, 15-15.

Maturana, H.R. and Varela, F.J. (1987). *The tree of knowledge: The biological roots of human understanding*. New Science Library/Shambhala Publications.

Mayhew, S. (2015). Marginalization. In *A Dictionary of Geography*. : Oxford University Press.

McCall, George J. and J. L. Simmons. (1966). *Identities and Interactions.* New York: Free Press.

Mead, G.H. (1935). *Mind, self, and society: From the standpoint of a social behaviorist* (Works of George Herbert Mead, Vol. 1). Chicago: University of Chicago Press

Meadows, D. H., Randers, J. & Behrens, W. W. (1972) *The limits to growth: a report to the Club of Rome*. New York: Universe Books.

Menzel, C. (1990). Actualism, ontological commitment, and possible world semantics. *Synthese*, 85(3), 355-389.

Metodiev, M. (2010). *Между вярата и компромиса. Българската православна църква и комунистическата държава* [*Between Faith and Compromise: The Bulgarian Orthodox Church and the Communist State*] Sofia: Ciela.

Midgley, G. (1989a). Critical systems and the problem of pluralism. *Cybernetics and Systems*, 20(3), 219-231.

Midgley, G. (1989b). Critical systems: The theory and practice of partitioning methodologies. *Proceedings of the 33rd Annual Meeting of the International Society for General Systems Research (Volume II)*, held in Edinburgh, Scotland, on 2-7 July 1989.

Midgley G (1990). Creative methodology design. *Systemist*, 12, 108-113.

Midgley, G. (1992). The sacred and profane in critical systems thinking. *Systems Practice*, 5(1), 5-16.

Midgley, G. (1995). The nature of critical self-reflection. *Journal of the Operational Research Society*, 46(4), 547-548.

Midgley, G. (1996). What is this thing called critical systems thinking? In, *Critical systems thinking: current research and practice*. Flood, R.L. and Romm, N.R.A. (eds.). Plenum, New York.

Midgley, G. (1998). *Rethinking the unity of science. Philpapers.org*.

Midgley, G. (1997a). Developing the methodology of TSI: from the oblique use of methods to creative design. *Systems Practice*, 10, 305-319.

Midgley, G. (1997b). Mixing methods: developing systemic intervention. In, *Multimethodology: the theory and practice of combining management science methodologies*. Mingers, J. and Gill, A. (Eds.). Wiley, Chichester.

Midgley, G. (2000). *Systemic intervention*. Springer, Boston, MA.

Midgley, G. (2001). Rethinking the unity of science. *International Journal of General Systems*, 30, 379-409.

Midgley, G. (ed.) (2003). *Systems thinking*, volumes I-IV. Sage, London.

Midgley G (2006). Systemic intervention for public health. *American Journal of Public Health*, 96, 466-472.

Midgley, G. (2008). Systems thinking, complexity and the philosophy of science. *Emergence: Complexity and Organization,* 55-73.

Midgley, G. (2011). Theoretical pluralism in systemic action research. *Systemic Practice and Action Research, 24*(1), 1-15.

Midgley G (2015). Systemic intervention. In, *The Sage handbook of action research*. 3rd Edition. Bradbury-Huang, H. (ed.). Sage, London.

Midgley, G. (2016). *Moving beyond value conflicts:: systemic problem structuring in action.* Hull University Business School Research Memorandum.

Midgley, G. (2018). Systemic intervention: theory, methodology and practice (published in both English and Russian). *Proceedings of the 5th Jubilee International Research and Practice Conference on System Analysis in Economics*, Moscow, Russia, November 2018.

Midgley, G. (2019a). *Personal communication.* 04/07/2019.

Midgley, G. (2019b). Moving beyond value conflicts: systemic problem structuring in action. *Hull University Business School Research Memorandum,* Hull, UK.

Midgley, G. (2020). *Personal communication.*

Midgley, G., Ahuriri-Driscoll, A., Foote, J., Hepi, M., Taimona, H., Rogers-Koroheke, M., ... & Veth, J. (2007). Practitioner identity in systemic intervention: Reflections on the promotion of environmental health through Māori community development. *Systems Research and Behavioral Science: The Official Journal of the International Federation for Systems Research*, 24(2), 233-247.

Midgley G., Johnson, MP and Chichirau, G. (2018). What is community operational research? *European Journal of Operational Research*, 268(3), 771-783.

Midgley G, Munlo, I. and Brown, M. (1998). The theory and practice of boundary critique: developing housing services for older people. *Journal of the Operational Research Society*, 49, 467-478.

Midgley G, Nicholson, J. and Brennan, R. (2017). Dealing with challenges to methodological pluralism: the paradigm problem, psychological resistance and cultural barriers. *Industrial Marketing Management*, 62, 150-159.

Midgley, G. and Reynolds, M. (2001). *Operational research and environmental management: a new agenda.* Operational Research Society, Birmingham.

Midgley, G. and Reynolds, M. (2004). Community operational research and environmental management: a new agenda. In, *Community operational research: or and systems thinking for community development.* Midgley, G. and Ochoa-Arias, A.E. (eds.). Kluwer, New York.

Midgley, G., & Reynolds, M. (2003). Operational research and environmental management: A new agenda. *Operational Research Society*, 54(12), 1308-1308.

Midgley, G., & Ochoa-Arias, A. E. (2001). Unfolding a theory of systemic intervention. *Systemic Practice and Action Research*, 14(5), 615-649.
Midgley, G., & Pinzón, L. A. (2011). Boundary critique and its implications for conflict prevention. *Journal of the Operational Research Society*, *62*(8), 1543-1554.

Midgley, G. and Ochoa-Arias, A. E. (2004). Introduction to Community Operational Research. In, *Community operational research: or and systems thinking for community development.* Midgley, G. and Ochoa-Arias, A.E. (eds.). Kluwer, New York.

Midgley, G., Winstanley, A., Gregory, W., & Foote, J. (2005). *Monograph 13 Scoping The Potential Uses Of Systems Thinking In Developing Policy On Illicit Drugs. DPMP Monograph Series.* Fitzroy: Turning Point Alcohol and Drug Centre.
Mikhailov, G. (2017). *The Thracians.* Sofia: NBUP.

Miletic, L. (1902). *The Old Bulgarian Population of Northeastern Bulgaria.* Sofia: BKD. *Старото българско население в Североизточна България.*

Miller, G. A. (1956). The magical number seven, plus or minus two: Some limits on our capacity for processing information. *Psychological Review*, *63*(2), 81.

Mingers, J. (1980). Towards an appropriate social theory for applied systems thinking: critical theory and soft systems methodology. *Journal of Applied Systems Analysis, 7*, 41-50.

Mingers, J. (1984). Subjectivism and soft systems methodology-A critique. *Journal of applied systems analysis, 11*, 85-104.

Mingers, J. (2002). Can social systems be autopoietic? Assessing Luhmann's social theory. *Sociological Review,* 50(2), 278-299.

Mingers, J. (2004). Can social systems be autopoietic? Bhaskar's and Giddens' social theories. *Journal for the Theory of Social Behaviour*, 34(4), 403-427.

Mingers, J. (2006). *Realising systems thinking: knowledge and action in management science.* Canterbury: Springer Science Business Media.

Mingers, J. (2014). *Systems thinking, critical realism and philosophy: a confluence of ideas.* New York: Routledge.

Miser, H. J. (1994). Systems analysis as dialogue: An overview. *Technological Forecasting and Social Change*, *45*(3), 299-306.

Miser, H. J., & Quade, E. S. (Eds.). (1985). *Handbook of systems analysis: craft issues and procedural choices* (Vol. 2). North-Holland.

Mitev, I. (1988) *History of the April Uprising.* [*История на Априлското въстание*] Sofia: BAN.

Mitroff, I. I., & Emshoff, J. R. (1979). On strategic assumption-making: A dialectical approach to policy and planning. *Academy of Management Review*, *4*(1), 1-12.

Mladenov (1979). *History of the Bulgarian Language.* Sofia: BAN. *Истории на българския език.* София: БАН.

Morecroft, J. D. W. & Sterman, J. D. (1994). *Modeling for learning organizations.* Portland: Productivity Press.

Moreto.net. (2018). *Ромка завърши образованието си във Варна, стана акушерка* [Romani woman graduates in Varna, becomes midwife] http://www.moreto.net/novini.php?n=394940 accessed 8th August 2019.

Morgan, P. (2005). *The idea and practice of systems thinking and their relevance for capacity development.* Maastricht: European Centre for Development Policy Management.

Moser, C. A. (1972). *A History of Bulgarian literature 865–1944* (Vol. 112). The Hague: Mouton & Co.

Munday, P. G. (2011). *Resilience for disasters: A theoretical assessment of four paradigms and boundaries.* Master of Research (MRes) Dissertation, University of Hull.

Municipality of Pazarzdhik Website: https://pazardzhik.bg/.

National Statistical Institute (2011a). *National census. Demographics and social characteristics of the population.* 1(2), 194. Национален статистически институт (2011а) *Преброяване на населението и жилищния фонд през 2011 г.* Том 1, Книга 2. Демографски и социални характеристики, 2-11, с. 194. Available online http://www.nsi.bg/census2011/pagebg2.php?p2=175&sp2=218 [Accessed 27/12/2015].

National Statistical Institute (2011b). *National census. Financial characteristics of the population.* 1 (3), 56. Национален статистически институт (2011б) *Икономически характеристики на населението,* с. 56.

Available   online
http://www.nsi.bg/census2011/pagebg2.php?p2=175&sp2=218   [Accessed
27/12/2015]

Nedev, N. (2007). *Три държавни преврата или Кимон Георгиев и неговото време* [Three Coups or Kimon Georgiev and His Time] Sofia: Ciela.

Nedev, N. (2013). *Цар Борис III* [Tsar Boris III] Sofia: Hermes

Neuburger, M. (1997). Bulgaro-Turkish encounters and the re-imaging of the Bulgarian nation (1878-1995). *East European Quarterly*, *31*(1), 1.

News.bg (2016) Chief Prosecutor in support of the veiling ban. *Newsbg* https://news.bg/crime/glavniyat-prokuror-tsatsarov-podkrepya-zabrana-na-burkite.html

News.bg (2016). 'Pazardzhik banned the burqas'. *News.bg.* 27/04/2016. Available at https://news.bg/regions/pazardzhik-zabrani-burkite.html.

Nikolov, A. (2012). *Факти и догадки за събора през 893 година* [Facts and Speculation about the Council of 893] in *България в световното културно наследство: Материали от Третата национална конференция по история, археология и културен туризъм* [Bulgaria in World Heritage: Materials from the Third National Conference on History, Archaeology, and Cultural Tourism" Shoumen.

Nikolov, J. (1997). Organized Crime in Bulgaria. *E. Eur. Const. Rev.*, *6*, 80.

Nobles, R. and Schiff, D. (2004). Introduction in F. Kastner, R. Nobles, D Schiff and R. Ziegert *Law as a social system. Niklas Luhmann.* Ofxford: Oxford University Press.

Noblit, G. and Hare, R. D. (1988). *Meta-ethnography: Synthesising Qualitative Studies*, Vol. 11, Sage.

Norris, H. T. (1993). *Islam in the Balkans: religion and society between Europe and the Arab world*. Univ of South Carolina Press.

Nova tv (2020). Reactions after the ban of Lukovarsh. *Novatv* Реакции след забраната на Луковмарш. 23/02/2020 https://nova.bg/news/view/2020/02/23/278902/%D1%80%D0%B5%D0%B0%D0%BA%D1%86%D0%B8%D0%B8-%D1%81%D0%BB%D0%B5%D0%B4-%D0%B7%D0%B0%D0%B1%D1%80%D0%B0%D0%BD%D0%B0%D1%82%D0%B0-%D0%BD%D0%B0-%D0%BB%D1%83%D0%BA%D0%BE%D0%B2%D0%BC%D0%B0%D1%88-%D0%B2%D0%B8%D0%B4%D0%B5%D0%BE

Novini.bg (2020). The Ministry of Internal Affairs has launched a new expert team that includes snipers. [МВР се сдоби с нова дирекция, включваща снайперисти]. 10 June 2020. *Novini.bg.* Available at https://novini.bg/bylgariya/obshtestvo/602961 [Accessed 10.08.2020].

National Statistical Institute (2005). *The Challenges of Poverty.* Sofia: NSI. *Предизвикателствата на бедността.*

Nuneva, D. (2003). *Education of the Roma and Multiculturalism.* Sofia: Agato. *Образованието на ромската общност в измеренията на мултикултурализма.* София: Агато.

O'Reilly, C., and Chatman, J. (1986). Organizational commitment and psychological attachment: The effects of compliance, identification, and internalization on prosocial behaviour. *Journal of Applied Psychology*, 71, 492-499.

Oakes, P. J., Haslam, S. A., & Turner, J. C. (1994). *Stereotyping and social reality.* Blackwell Publishing.

Ognyanov, L. (2008). *Политическата система в България 1949-1956* [The Bulgarian Political System 1949-1956] Sofia: Standard Press.

O'Higgins, N., & Ivanov, A. (2006). Education and employment opportunities for the Roma. *Comparative Economic Studies*, *48*(1), 6-19.

Ovcharov, N. (2017). *Tsar Ivan Asen. The Peacemaker*. Sofia: Faber. *Цар Иван Асен. Миротворецът.*

Oxfam (2015). *Refugees crossing into Europe tell of abuse at hands of Bulgarian police.* 15/11/2015. Available online https://www.oxfam.org/en/pressroom/pressreleases/2015-11-13/refugees-crossing-europe-tell-abuse-hands-bulgarian-police [Accessed 17/12/2015].

Pamporov, A. (2007). Sold like a donkey? Bride-price among the Bulgarian Roma. *Journal of the Royal Anthropological Institute*, 471-476.

Pancheva, V. (2016). DPS MPs left the parliamentary session because of the face-veil ban. *Dariknews.* 30.09.2016. Депутатите от ДПС напуснаха парламентарната зала заради "закона за бурките" Available at https://dariknews.bg/novini/bylgariia/deputatite-ot-dps-napusnaha-parlamentarnata-zala-zaradi-zakona-za-burkite-1609560 Accessed [10.01.2017].

Parekh, B. (2008). *A new politics of identity: political principles for an interdependent world.* Palgrave Macmillan.

Parekh, B. (2009). Logic of identity. *Politics Philosophy Economics*, 8(3), 267-284.

Pavlov, P. (2019). *Забравеното средновековие* [The Forgotten Middle Ages] Sofia: Sdruzhenie Balgarska Istoriya.

Pazardzhik County Council (2016). *Proposition for Public Order Ordinance*, Pazardzhik Municipality No 61/27.04.2016

Pei, S. (2012). Unveiling Inequality: Burqa Bans and Nondiscrimination Jurisprudence at the European Court of Human Rights. *Yale LJ*, *122*, 1089.

Petkova, S. (2020). *Mandatory masks.* Available at https://petkovalegal.com/%D0%B7%D0%B0%D0%B4%D1%8A%D0%BB%D

0%B6%D0%B5%D0%BD%D0%B8%D0%B5-%D0%B7%D0%B0-%D0%BD%
D0%BE%D1%81%D0%BD%D0%B5-%D0%BD%D0%B0-%D0%BC
%D0%B0%D1%81%D0%BA%D0%B0/

Petrov, T. (2016b). Eight women fined for wearing a burqa by August 2016. *BG on Air*, 04/08/2016. Available at https://www.bgonair.bg/a/2-bulgaria/58630-globi-za-osem-zheni-s-burki-v-pazardzhik

Petrova, N. (2019). Ahmed Musa in prison for 4 years. *Bulgarian National Radio.* Available at https://bnr.bg/play/post/101112448/ahmed-musa-vliza-za-4-godini-v-zatvora

Piela, A. (2020). 'Muslim women who cover their faces find greater acceptance among coronavirus masks – 'Nobody is giving me dirty looks''. *The Conversation*, April 10, 2020

Popper, K. R. (1959). *The logic of scientific discovery.* Oxford, England: Basic Books.

Popper, K.R. (1972). *Objective Knowledge.* Oxford University Press, Oxford.

Portmore, D. W. (2011). *Commonsense consequentialism: Wherein morality meets rationality* (Vol. 2). OUP USA.

Posner, R. (1973). *Economic analysis of law.* New York: Aspen

Prodanov, V. and Todorova, B. (eds) (2005). *The dangers of Islamism in Bulgaria.* Sofia: IFI – BAS. Проданов, В. и Б. Тодорова (ред) (2005) *Рискове за България от ислямски фундаментализъм и тероризъм*, София: ИК ИФИ-БАН.

Quade, E. S. (1964). *Analysis for military decisions* (Vol. 387, No. PR). RAND CORP SANTA MONICA CA.

Rashkov, M. (2020). *The emergency – masks and fines.* Available at https://rashkov.eu/globi/%D0%B8%D0%B7%D0%B2%D1%8A%D0%BD%D

1%80%D0%B5%D0%B4%D0%BD%D0%BE-%D0%BF%D0%BE%D0%BB%D0%BE%D0%B6%D0%B5%D0%BD%D0%B8%D0%B5-%D0%B7%D0%B0%D1%89%D0%B8%D1%82%D0%BD%D0%B8-%D0%BC%D0%B0%D1%81%D0%BA%D0%B8

Rochow, I., & Matschke, K. (1998). Byzantine Law and the Wends in the 13th and 14th Centuries. Neues zu den Zigeunern im Byzantinischen Reich um die Wende von 13. Zum 14. Jahrhundert. *Jahrbuch der Osterreichischen Byzantinistik*, *41*, 241-254.

Romm, N.R.A. (2001). *Accountability in Social Research: Issues and Debates.* Springer, New York.

Rosenhead, J. (1987). From management science to workers' science. *New Directions in Management Science*, *109*, 131.

Rottleuthner, H. (1988). Biological Metaphors in Legal Thought. In, Teubner, G. (ed.). *Autopoietic Law: A New Approach to Law and Society.* De Gruyter, Berlin.

Rottleuthner, H. (1988). Biological Metaphors in Legal Thought. In, Teubner, G. (ed.). *Autopoietic Law: A New Approach to Law and Society.* De Gruyter, Berlin.

Runciman, S. (1930). *A history of the First Bulgarian Empire.* Chicago: The University of Chigaco Press.

Saiya, N., & Manchanda, S. (2019). Do burqa bans make us safer? Veil prohibitions and terrorism in Europe. *Journal of European Public Policy*, 1-20.

SANS – State Agency for National Security of Bulgaria (2015) New PRN agents received their first training. 25/10/2015. Available online http://www.dans.bg/en/projects-en/propak-240314-mitem-bul [Accessed 15/12/2015].

Saunders, P., (1979*). Urban politics: a sociological interpretation* (Vol. 9). London: Routledge.

Saussure, F. de. (1972). *Course in general linguistics*. Trans. R. Harris. London: Duckworth.

Sen, A. (1993). Capability and well-being, in: M.C. Nussbaum & A.K. Sen (Eds) *The Quality of Life* (Oxford, Clarendon Press), pp. 30–53.

Sen, A. (2000). Social exclusion: Concept, application, and scrutiny. *Social development paper no 1*. Office of Environment and Social Development Asian Development Bank. Available at https://think-asia.org/bitstream/handle/11540/2339/social-exclusion.pdf?sequence=1 [Accessed 16/05/2017].

Sen, A. (2006). *Identity and Violence: The Illusion of Destiny*. New York: Norton, London: Penguin.

Sen, A. (2009). The fog of identity. *Politics, Philosophy & Economics*, *8*(3), 285-288.

Senge, P. (1990). *The fifth discipline: the art and practice of the learning organisation.* New York: Doubleday.

Seton-Watson, R. W. (2012). *Disraeli, Gladstone & the Eastern Question*. London: Routledge.

Seventh Grand National Assembly (1991) *Constitution of Bulgarian Republic*. Available at http://www.parliament.bg/en/const

Simester, A. P., Spencer, J. R., Stark, F., Sullivan, G. R., & Virgo, G. J. (2019). *Simester and Sullivan's criminal law: theory and doctrine*. Bloomsbury Publishing.

Skrinski, R. (2016). DPS MPs left the parliamentary reading of the 'burqa ban' bill. *Actualno* available at https://www.actualno.com/politics/deputatite-ot-dps-napusnaha-parlamentarnata-zala-zaradi-zakona-za-burkite-news_565795.html

Sliven County Council (2016). Public Order Ordinance, Sliven Municipality (No 231/26.05.2016)

Smyth, D. S., & Checkland, P. B. (1976). Using a systems approach: the structure of root definitions. Journal of Applied Systems Analysis, 5(1), 75-83.
Snijders, T. A., Lewis-Beck, M., Bryman, A. E., & Liao, T. F. (2003). The SAGE *Encyclopedia of Social Science Research Methods* (Volume II).

Spencer, A. W. (1914). The Balkan Question—The Key to a Permanent Peace. *American Political Science Review*, *8*(4), 563-582.

Standart (2016). 'Stara Zagora also banned the burqas'. *Standart* 28/04/2016. Available online http://m.standartnews.com/balgariya-obshtestvo/i_stara_zagora_zabrani_feredzhetata_i_burkite-331241.html Accessed 03/08/2017

Stanev, N. (1935). *Bulgaria under the Yoke.* Sofia: Atanassov. *България под иго.*
State Agency for Refugees (SAR) (2017) *Applications and decisions 1993-2017.* Държавна агенция за бежанците (2017) Кандидатсване за закрила и решения 1993-2017. Available online at http://www.aref.government.bg/index.php/bg/aktualna-informacia-i-spravki Accessed 04/08/2017.

Stebbins, R. A. (1997). Exploratory research as an antidote to theoretical stagnation in leisure studies. *Loisir et Société/Society and Leisure*, *20*(2), 421-434.

Stebbins, R. A. (2001). *Exploratory research in the social sciences* (Vol. 48). Sage.

Steier, F. (1995). Reflexivity, interpersonal communication, and interpersonal communication research. In Leeds-Hurwitz, W. ed (1995) *Social approaches to communication*. New York: The Guildford Press. pp 63-87.

Stoilova, Z. (2016a) *The Roma and the radicals: Bulgaria's alleged ISIS support base.* Vales: Balkan Fellowship for Journalistic Excellence. 11 January

2016. Available at http://www.balkaninsight.com/en/article/the-roma-and-the-radicals-bulgaria-s-alleged-isis-support-base-01-10-2016-1 [accessed 01/08/2017].

Stoilova, Z. (2016b) 'The burqa debate is a media balloon'. *Capital,* 06/04/2016. Стоилова, З. (2016b) Защо темата за бурките е медиен балон, *Капитал* 06/04/2016. Available online at http://www.capital.bg/politika_i_ikonomika/bulgaria/2016/04/06/2736832_zashto_temata_za_burkite_e_medien_balon/ Accessed 08/08/2017.

Stokes, P. A. (2009). *The viability of societies: governance and complexity today*. VDM Publishing.

Sullivan, R. E. (1966). Khan Boris and the conversion of Bulgaria: a case study of the impact of Christianity on a barbarian society. *Studies in Medieval and Renaissance History*, *3*, 55-139.

Sumner, B. H. (1935). Russia and Panslavism in the Eighteen-seventies. *Transactions of the Royal Historical Society*, *18*, 25-52.

Tajfel, H. (1982) Instrumentality, identity and social comparisons. In H. Tajfel (Ed.), *Social identity and intergroup relations* (pp.483-507). Cambridge: Cambridge University Press.
Tajfel, H. and Turner, J.C. (1979) An integrative theory of intergroup conflict. *The social psychology of intergroup relations*, 33(47), 74.

Tajfel, H., & Turner, J. C. (1986). The social identity theory of intergroup behaviour (pp. 7–24). *1986). Psychology of Intergroup Relations. Chicago, United States of America: Nelson. Recuperado de: http://www. sozialpsychologie. uni-frankfurt. de/wp-content/uploads/2011/10/Tajfel_ Turner. pdf.*

Tajfel, H., and Turner, J. C. (1985) The social identity theory of intergroup behaviour. In S. Worchel and W. G. Austin (Eds.), *Psychology of intergroup relations* (2nd ed., pp. 7-24). Chicago: Nelson-Hall.

Taras, R. (2013). 'Islamophobia never stands still': race, religion, and culture. *Ethnic and Racial Studies*, 36(3), 417-433.

Taylor, C. (1989). Sources of the self: The making of the modern identity. Harvard: Harvard University Press.

Thoits, P. A. (1986). Multiple identities: Examining gender and marital status differences in distress. *American Sociological Review*, 259-272.

Thomas, A. & Lockett, M. (1979) Marxism and systems research: values in practical action, in Flood, R. L. & Jackson, M. (1991) *Creative problem solving: Total systems intervention*. New York: John Wiley & Sons.

Timmerman, T. (2015). Does scrupulous securitism stand-up to scrutiny? Two problems for moral securitism and how we might fix them. *Philosophical Studies*, 172(6), 1509-1528.

Todorov, B. (2010). The value of empire: tenth-century Bulgaria between Magyars, Pechenegs and Byzantium. *Journal of Medieval History*, *36*(4), 312-326.

Todorova, M. (2013) The effects of Communism on Bulgarian churches. *Bulgarian Protestant Methodist Church Bulletin.* Тодорова, М. (2013) Ефектът на комунизма върху работата на българските църкви. Available online http://methodist.bg/spell/efektat-na-komunizma-varhu-rabotata-na-tsarkvite-v-balgariya/ ccessed 04/08/2017.

Tolman, E. C. (1943) Identification and the post-war world. *Journal of Abnormal and Social Psychology*, 38, 141-148.

Tonev, V. (1995). *The Bulgarian Black Sea during the Revival*. Sofia: Marin Drinov. Българското Черноморие през Възраждането. София: Марин Дринов.

Topnovini (2016). Kuneva is also against the face-veil. *Topnovini.* И Кунева се обяви „против" бурките 02. 04. 2016. Available al

https://topnovini.bg/novini/666366-i-kuneva-se-obyavi-protiv-burkite?__cf_chl_jschl_tk__=c2b79b9150df5ff2c55fb4e11e9c474fa439d513-1589876332-0-AS0GW11xD8w84Tarzr98MEZE_2RftWp43hwjkHpTrsK9oldK2_coXK4oyQPcdEh1LZNDT4U7Y9RBAGFQ35LRpBrnhShOvcTxPBG3MJxz5n4I5PtOAgyYtpHPP18A8OdMadxcFcP-ct4bP9qH_vFKzxDNHj_-ZTgDZd0R_K6d-itnGC3niBrC64M1p5wX5zDlfVKYNuKi8JDjHG2-twnFgjy-aR3Cap0itOdxtJpDWoxJEIiegZyMmJQywoOD290iy1Jr4vVaFQeySZW5UYCTiYTrF9NmjC--MyH9p4D6pKLRpiBjCFoPXC5pbIle9DwBghgaUnKIDcM3ux1TRADzaQw [Accessed 20/01/2017].

Trist, E. (1981). The evolution of socio-technical systems. *Occasional Paper*, *2*(1981), 1981.

Trist, E. L., & Bamforth, K. W. (1951). Some social and psychological consequences of the longwall method of coal-getting: An examination of the psychological situation and defences of a work group in relation to the social structure and technological content of the work system. *Human Relations*, *4*(1), 3-38.

Trist, E., Higgin, G., Murray, H., and Pollock, A. B. (1963). *Organisational choice.* London: Tavistock Publications.

Trud (2016) Забраняват бурките в държавни и общински институции в град Пазарджик. *Trud.* The face-veils banned off governmental buildings in the city of Pazardzhik. *Trud* 12/04/2016. Available online https://trud.bg/article-5425770/ Accessed 03/08/2017.

Tsanev, S. (2006). *Bulgarian Chronicles, Volume I.* Sofia: Trud. Български хроники Том II. София: Труд.

Tsanev, S. (2007). *Bulgarian Chronicles 1453-1878. Volume II.* Sofia: Trud. Български хроники: 1453-1878. Том II. София: Труд.

Tsanev, S. (2008). *Bulgarian Chronicles 1878-1943. Volume III.* Sofia: Trud. Български хроники: 1878-1943. Том III. София: Труд.

Tsanev, S. (2009). *Bulgarian Chronicles 1943-2007. Volume IV.* Sofia: Trud. Български хроники Том IV. София: Труд.

Turner, J. C., Hogg, M. A., Oakes, P. J., Reicher, S. D., & Wetherell, M. S. (1987). *Rediscovering the social group: A self-categorization theory.* Basil Blackwell.

Turner, M. E., Pratkanis, A. R., Probasco, P., & Leve, C. (1992). Threat, cohesion, and group effectiveness: Testing a social identity maintenance perspective on groupthink. *Journal of Personality and Social Psychology*, *63*(5), 781.

Tzvetkov, P. S. (1992). The politics of transition in Bulgaria: back to the future?. *Problems of Communism*, *41*(3), 34.

Ullah, P. (1987). Self-definition and psychological group formation in an ethnic minority. *British Journal of Social Psychology*, *26*(1), 17-23.

Ulrich, D. (1996). *Human resource champions: The next agenda for adding value and delivering results.* Harvard Business Press.

Ulrich, W. (1983) *Critical heuristics of social planning.* West Sussex: John Wiley & Sons, Ltd.

Ulrich, W. (1987) Critical heuristics of social systems design. Methodology for Public Decision-Making *Interactive Decision Support Systems Queue and Game Theory*, 31(3), 276-283. 357

University of Hull (2015). *Code of Good Research Practice.* Available online at https://www.hull.ac.uk/work-with-us/research/site-elements/docs/code-of-good-research-practice.pdf

Vaglenov, S. (2008). Bulgaria – Overview. *Organised Crime and Corruption*

Reporting Project. Available at
https://www.occrp.org/en/component/content/article?id=53o1:bread.
Accessed 26/08/2019.

Van der Schyff, G. & Overbeeke, A. (2011) Exercising religious freedom in the public space: A comparative and European convention analysis of general burqa bans. *European Constitutional Law Review*, 7(3), 424-452.

Varela, F. (1979). *Principles of biological autonomy.* New York: North Holland.

Varela, F. (1981). Describing the logic of the living: The adequacy and limitations of the idea of autopoiesis. *Autopoiesis: A Theory of Living Organization*, 36-48.Varela, F. G., Maturana, H. R., & Uribe, R. (1981). Autopoiesis: the organization of living systems, its characterization and a model. In *Cybernetics Forum* (pp. 7-13).

Varela, F.G., Maturana, H.R. and Uribe, R. (1974) Autopoiesis: the organization of living systems, its characterization and a model. *Biosystems*, *5*(4), pp.187-196.

Vessel, J. P. (2016). Against securitism, the new breed of actualism in consequentialist thought. *Utilitas*, 28(2), 164-178.

Bertalanffy, L., von (1950). An outline of general system theory. *British Journal for the Philosophy of science,* pp 134-165.

Von Foerster, H. (1979). Cybernetics of cybernetics. In, *Communication and control in society.* Krippendorf, K. (ed.). Gordon and Breach, New York

Von Foerster, H. (1984). *Observing systems.* California: Intersystems publications.

Von Glasersfeld, E. (1985). Reconstructing the concept of knowledge. *Archives de Psychologie*, 53, 91-101.

Gregory, W. (1994) Critical appreciation: thinking, speaking and acting critically. In *New systems thinking and action for a new century*, Volume II. (B. BRADY and L. PEENO, Eds) pp. 1555-1574. International Society for the Systems Sciences, Louisville, Kentucky.

Walsham, G. (2006). Doing interpretive research. *European Journal of Information Systems*, 15(3), 320-330.

Weakland, J. H., & Jackson, D. D. (1958). Patient and therapist observations on the circumstances of a schizophrenic episode. *AMA Archives of Neurology & Psychiatry*, *79*(5), 554-574.

Weber, M. (1918). *Politik als Beruf. Politics as vocation*. Available at https://www.balliol.ox.ac.uk/sites/default/files/politics_as_a_vocation_extr act.pdf [Accessed 28/06/2020].

Whitehead, A. N. (1929). *The function of reason*. Oxford, England: Princeton University Press.

Wiener, N. (1948). *Cybernetics or control and communication in the animal and the machine.* Technology Press.

Wolff, R. L. (1949). The Second Bulgarian Empire. Its Origin and History to 1204. *Speculum*, *24*(2), 167-206.

Yolles, M. (1999). *Management systems: a viable approach*. Pitman, London.

Yolles, M. (2001). Viable boundary critique. *Journal of the Operational Research Society*, *52*(1), 35-47.

Young, J. (2007) *The vertigo of late modernity*. London: Sage Publications.

Zhelyazkova, A. (2012) Is the Bulgarian 'Divided times' returning? *Liberal Review*. 23/09/2012. Желязкова, А. (2012) Връща ли се бъларското „Време разделно"?, 23.09.2012, Available at http://www.librev.com/index.php/discussion-politics-publisher/1777-2012-09-23-10-40-53 [Accessed 12/12/2015].

Zilberman, A., & Webber, S. (2003). Public Attitudes toward NATO Membership in Aspirant Countries in M Vlachova (ed), *Public image of security: defence and the military in Europe.* Belgrade: Goragraf. Pp 50-72.

Zimonyi, I. (1989). The origins of the Volga Bulgarians. *Studia Uralo-Altaica, 32,* 1-211.

I

Appendix I: Timeline of relevant historical events

FOUNDATION OF FIRST BULGARIAN STATE — 681 — 700
Christianisation — 864 — 800 — 900
BYZANTINE CONQUEST — 1018 — 1000 — 1100
FOUNDATION OF SECOND BULGARIAN STATE — 1185 — 1200
OTTOMAN CONQUEST — 1396 — 1300 — 1400
Roma Migration — 1500
Chiprovtsi Uprising — 1688 — 1600 — 1700 — 1800
1878-1886 Republic of Tamrash — 1878
FOUNDATION OF THIRD BULGARIAN STATE

Balkan Wars 1912-1915
Communist Purges 1944-1954
Start of Revival Process 1984
Burqa Ban 2016
1900 — 1910 — 1920 — 1930 — 1940 — 1950 — 1960 — 1970 — 1980 — 1990 — 2000
Foundation of DPS