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Minority Group Demands and the Challenge of Islam

Over the last decade much has been written on multiculturalism in relation to citizenship. Increasing clashes between minority and majority populations over issues, such as language rights, regional autonomy, political representation, education curriculum, land claims, immigration and naturalization policies, and national symbols, are seen by some as the central defining feature of contemporary societies and as "the greatest challenge" (Kymlicka 1995a, 1) to the liberal nation-state. Such problems are seen to arise from the increasing demands that are put forward by migrants and minorities for special group rights and recognition, exemption from duties, and support from the state for their cultural differences and identities. They are also considered to be widespread; for example, Gutmann states, "[I]t is hard to find a democratic or democratizing society these days that is not the site of some significant controversy over whether and how its public institutions should better recognize the identities of cultural and disadvantaged minorities" (1994, 3). A broad range of such group demands by migrants have appeared on the public stage, including exemptions from laws that penalize cultural practices, assistance to do things the majority can do unassisted, self-government for national minorities, external rules restricting nonmembers' liberty to protect the group members' culture, incorporation of religious legal codes within the dominant legal system, special group representation within government institutions, and symbolic recognition within the broader state community (see Levy 1997).

Within academic debates on multicultural rights, different normative evaluations have been put forward in many important contributions,

(see Bauböck 1994; Miller 1995; Spinner 1994; Taylor 1992; Philips 1995; Canovan 1996; Gilbert 1998; Glazer 1997; Modood 2000; Huntington 2002). On one side, proponents of multicultural rights (e.g., Young 1998) see migrants' claims making for special group rights and recognition as a justified and liberating challenge to the unified, undifferentiated citizenship of the liberal nation-state that is underwritten with an in-built "white" cultural hegemony. On the other, detractors of multiculturalism (e.g., Schlesinger 1998) see new demands for group rights and recognition as a dangerous attack on the shared communal values and solidarity that underpin the basis of citizenship in liberal nation-states and that are necessary for social cohesion. Many scholars tread somewhere in the middle ground of this normative terrain. For example, Kymlicka and Norman argue that the depictions in such polemics have become unhelpful to understanding the problematic: "No one can rest content with the sort of rhetorical generalizations that characterised the 'culture wars' of the 1980s and early 1990s. Critics of minority (group) rights can no longer claim that minority (group) rights inherently conflict with citizenship ideals; defenders of minority (group) rights can no longer claim that concerns about civility and civic identity are simply illegitimate attempts to silence or dismiss troublesome minorities" (2000, 41).

Following on from chapter 3, where we examined the general cross-national differences in migrants' claims making, here we focus specifically on the nature of the challenge of migrants' claims making for group demands to their European societies of settlement by recourse to our comparative data set.

The Challenge of Migrants' Group Demands

Others have used the terms "multiculturalism" or "differentiated citizenship" to refer to migrants' particularist group demands. Because we use the term "multiculturalism" for a policy approach, we propose to use the term "group demands" as an umbrella term for the political field of claims by migrants for group-specific rights, recognition, and exemptions from duties with respect to the cultural requirements of citizenship in their societies of settlement. Although this category is heterogeneous, all group demands share two features: first, they are demands that go beyond the set of common civil and political rights of individual citizenship that are protected in all liberal democracies; and second, they are demands that, if realized, constitute the recognition and accommodation by the state of the distinctive identities and needs of migrant groups.[1]

Regarding the purported challenge of multicultural claims by migrants,

a first point to make is that the idea of a unitary citizenship based on equal individual rights, on which liberalism rests, is an ideology and nor an accurate depiction of reality for the typical liberal nation-state. On the contrary, most nation-states attribute some group rights in the form of corporatist or federal arrangements, and most nation-states give preferential treatment to specific religions over others. Thus in Britain, the historical accommodation of church and state has left the monarch both head of state and head of the Anglican Church. Religious institutions receive no direct state support, but the state privileges its own religion within its understanding of politics. Catholic and Jewish faiths have over time achieved a near parity with the Anglicans, and thereby receive substantial state funding for their faith-based denominational schools. However, the state has been more resistant to the idea of funding the schools of the newcomer religion Islam. Despite long-standing requests, it is only in the last couple of years that funding status has been granted and even then only to a few Muslim schools.[2]

Another important point is that although controversies about multiculturalism are often played out publicly through symbols, such as head-scarves and minarets, the conflicts are not only about forms of cultural expression and identities; they are also conflicts about the distribution of material resources. For example, in Germany a "Church tax" is levied on individual employees, and state funds are distributed to recognized religions. If Turkish migrants were allowed to contribute to their own faith denomination, which they are not, would this not only bring symbolic recognition, but also make it difficult for the state to deny granting tax revenues to Islamic organizations, which is what it does for Christian and Jewish ones (see Laurence 2001)? This example demonstrates that many cultural demands are not just about value conflicts, but also about material stakes in society. Cultural demands that are made by migrants in policy fields such as public education or welfare, where the state has responsibilities for providing and distributing services, present challenges to a preexisting institutionalized context in which the native "white" population has defined stakes. If granted, such demands require changes in existing institutionalized practices and in many cases a redistribution of public resources that brings them into competition with those of other community groups, such as old, gay, disabled, poor, homeless, and unemployed people. Such cases of migrants' group demands are more likely to face trenchant opposition because they appear to challenge the perceived interests of the host public. Thus the state is often required to take a stand and act as an arbiter between native and migrant stakeholders.

Although some cultural demands by migrants are for parity of treat-

ment with other religious and ethnic groups, others go further, requesting special treatment for the group relative to other members and groups in society. Some exceptional demands are easily accommodated by liberal states. Indeed, in the case of reparations for Nazi crimes in the Holocaust, the German state has itself promoted preferential treatment for the associational activities of Jews and Roma. Other demands are less easy to accommodate because they actually challenge the very essence of liberal values. For example, Muslim migrants wishing to practice polygamy, female circumcision, or sharia divorce would be committing acts that contradict most liberal states' legal and moral understandings of equality between individuals and between men and women. How common or representative of cultural demands such cases are, is, of course, an empirical question. We suspect that many migrants in Europe are likely to adhere to more secular or modern understandings of Islamic practice, and that practices of this kind would be likely to diminish over time, making them atypical rather than the norm.

Examples such as female circumcision or sharia divorce are perhaps more present in academic literature than they are representative of real cases in the social world. Most public controversies are over the position of Islam in institutional settings and issues such as single-sex Islamic schooling or arranged marriages for young girls. Should the state intervene to protect the rights of the woman or the child, or alternatively should the individual be allowed to exercise their freedom of choice and religious belief, even when translating such beliefs into action contravenes liberal norms? Taking the example of separate schooling for Muslim girls in Britain, this would be a demand for parity rather than exceptional treatment with respect to other faith groups, some of which have state-sponsored single-gender schools. However, the important difference between Catholic girl schools and Islamic girl schools is that Islamic schools put religious faith at the center of the educational process and promote a set of values that are less commensurable with liberalism than the teachings of modern institutional and secularized Catholicism. States are wary of offering an equality of group rights to Muslims if these will be used to promote values or practices that contradict the values underpinning the host society. In some cases, Muslim parents' arguments for their own faith schools make little effort to fit within the cultural pluralism of the national civic community, for example, when they express fears at the possible westernization of their children. Important here is that some Muslims see Islam as being more true than other faiths and more authoritative than the state. This is problematic for liberal democracies, which are able to offer at most only a parity of political space to migrant

religions that is equivalent to that already allotted to other religious faiths, many of which have already been domesticated, rendered benign, and institutionalized by the secularizing tendencies of political accommodation.

Another point, with respect to the high resonance of issues relating to migrants' group demands in public debates, concerns the native publics of the host society. Native publics and their liberal intellectuals often come to see themselves as the *defenders* and upholders of the myth of a unitary national citizenship. However sincere such allegiances to liberal principles may be, it is also the case that their proponents may be wedded to a version of those concepts that is now a historical anachronism or, alternatively, based on nostalgia for the nation's past. In cases such as Rushdie in Britain or the headscarf affair in France, public discourse dynamics tend to take over, and the facts of the actual problems become distorted under a barrage of rhetoric about national values and identity. Thus the importance and nature of the multicultural challenge may be twisted and overblown in the public imagination.

Although the multicultural citizenship debates have inspired a number of studies with a more empirical focus (e.g., Joppke 1996, 1999; Rex 1996; Modood and Werbner 1997; Martiniello 1998; Kymlicka and Norman 2000), up to now the rigor of the philosophical debates has not been matched by systematic empirical evidence that would allow us to ascertain the importance and nature of migrants' cultural group demands, either with respect to other types of claims making or cross-nationally. Against this, there has recently been a trend toward edited volumes of national case studies on the position of Muslim migrants in Western societies (Vertovec and Rogers 1998; Haddad Yazbeck and Esposito 2000; Alsayyad and Castells 2002; Haddad Yazbeck and Smith 2002; and Hunter 2002). However, such contributions often fail to compare Muslims with other groups or to draw systematic cross-national conclusions.

Over the last decades, there have been a long series of dramatic episodes where Western societies have vociferously wrestled with their liberal dilemmas over multiculturalism and Islam. Headscarf affairs resonated most loudly in France, but also took place in Britain and then later in Germany and Switzerland. Similarly, the fatwa issued against Salman Rushdie and the publication of his *Satanic Verses* sparked intense debates about Islam among European intellectuals and publics alike, as have international events, such as 9/11, two Gulf Wars, the ongoing Israeli-Palestinian conflict, and the terrorist attacks on Madrid in 2004. Spectacular examples of Muslims' group demands have been cause célèbres for public debates

across Europe, and academic research is littered with case study anecdotal accounts of Rushdie and the headscarf affair in France. What is less clear is the extent to which such cases are representative and what they are actually representative of. Such issues can only be resolved by empirical investigation. The fact that our sample has been collected on regular days across time, and across countries, gives us the opportunity to examine the scale of group demands compared to other forms of claims making and to undertake qualitative analyses on cross-nationally representative samples of migrants' group demands.

The Scale and Source of Migrants' Group Demands

A first empirical question is the extent of migrants' claims making for group demands in the five countries, which gives an indication of the scale of the purported challenge they present to liberal nation-states. Table 28 shows cases where the substantive focus of migrant claims making is for group demands relating to cultural or religious differences.[3] It gives figures, first, for all collective actors (first row), and then for migrants (second row), as a proportion of all claims making on immigration and ethnic relations. The third row shows migrants' claims for group-specific demands as a proportion of migrants' claims making.

Table 28. Share of claims making about group demands in immigration and ethnic relations, 1992–98

Claims making	Netherlands	Britain	France	Germany	Switzerland
Claims about group demands out of all claims making in immigration and ethnic relations (%)	5.5	7.7	6.6	1.2	1.2
Migrants' claims for group demands out of all claims making in immigration and ethnic relations (%)	2.0	3.4	2.1	0.4	0.4
N	2,286	1,313	2,388	6,432	1,365
Migrants' claims for group demands out of all migrants' claims making (%)	20.8	17.1	18.4	5.3	6.4
N	216	258	267	470	80

Table 29. Collective identities used by migrants for making group demands, 1992–98

Collective identities	Netherlands	Britain	France
Policy-status identities (%)	15.6	4.6	32.7
Foreigners (%)	8.9	–	–
Minorities/allochthonen (%)	4.4	4.6	–
Immigrants (%)	2.2	–	10.2
Illegal immigrants/sans-papiers (%)	–	–	2.0
Harki (%)	–	–	20.4
Racial identities (%)	2.2	22.7	0.0
Black (%)	–	18.2	–
Asian (%)	–	2.3	–
Other (%)	2.2	2.3	–
Religious identities (%)	60.0	65.9	53.1
Muslim (%)	46.7	61.4	51.0
Hindu (%)	6.7	2.3	–
Rastafarian (%)	2.2	2.3	–
Other (%)	4.4	–	2.0
Ethnoreligious identities (%)	2.2	6.8	8.2
Jewish (%)	2.2	6.8	8.2
Ethnic and national identities (%)	31.1	0.0	6.1
Sinti and Roma (%)	2.2	–	–
Turkish (%)	15.6	–	–
Chinese (%)	2.2	–	–
Moluccan (%)	2.2	–	–
Morocco (%)	6.7	–	2.0
Other African (%)	2.2	–	4.1
Surinamese (%)	2.2	–	–
Hyphened identification with country of residence (%)	2.2	9.1	14.3
Total (%)	111.1	109.1	114.3
N	4 5	44	49

First, we see that, quantitatively, even when we include the claims by nonmigrant collective actors, the proportion of claims making on group-specific demands remains very modest: Netherlands, 5.5 percent; Britain, 7.7 percent; France, 6.6 percent; Germany, 1.2 percent; and Switzerland, 1.2 percent. Second, migrants' group-specific demands constitute a very small proportion of all claims, accounting for 2.0 percent in the Netherlands, 3.4 percent in Britain, 2.1 percent in France, and a miniscule 0.4 percent in both Germany and Switzerland. According to such figures, the dooms-day scenario of "tribal antagonisms" (Schlesinger 1998, 13) pulling socie-ties apart at the cultural seams, or Huntington's (2002) "clash of civiliza-tions" imported by immigration, appear to be strongly overstated, at least for the case of migrant populations in Europe, as does Kymlicka's vision of multicultural demands being the "greatest challenge" to the liberal state (1995a, 1).[4]

In addition, Table 28 shows a difference between those countries that substantially grant political rights to migrants, where group demands ac-count for a fifth of migrants' claims making (Netherlands, 20.8 percent; Britain, 17.1 percent; France, 18.4 percent), and those which do not (Ger-many, 5.3 percent; and Switzerland, 6.4 percent) and have roughly three times less. This finding demonstrates that nationally specific approaches to granting formal citizenship rights matter in giving migrants the confidence to feel sufficiently part of a society to make group-specific demands on it. However, another finding from Table 28 goes against the expectations that are derived from national approaches for institutional channeling and po-litical opportunities, including our own developed in chapter 3. Following our discussion of cross-national differences in chapter 3, we would expect to find much lower levels of migrants' group-specific demands in France than in countries such as the Netherlands and Britain, which officially see them-selves as multicultural and multiracial societies and which tolerate cultural diversity as one of their constituent principles. On the contrary, our data show similar levels of group-specific demands in France, Britain, and the Netherlands. This points to a limitation of national citizenship approaches in explaining migrant behavior and shows that there is a grain of truth in the multicultural thesis that sees demands for group rights and recognition as a product of migrants' claims making that is relatively autonomous from the state's integration policies. To investigate this further, we need to know which types of migrants make group demands.

Table 29 shows the type of collective identities expressed by migrants when making group demands in the three countries where we have a suf-ficient number of cases, the Netherlands, Britain, and France.[5] The most

striking feature is that more than half of these migrant group demands were made using religious forms of identification in France (53.1 percent), six-tenths in the Netherlands (60.0 percent), and two-thirds in Britain (65.9 percent). In addition, we see that the vast majority of these group demands were made by migrants identifying themselves as Muslim or Islamic (France, 51.0 percent; Netherlands, 46.7 percent; Britain, 61.4 percent).[6] This is surprisingly high for Britain, which sponsors the Asian identity for Indian subcontinent minorities, and for France, whose policies are against recognizing specific groups of migrants. At the same time, we discover that in the European context group demands are made principally through one religious self-identification, i.e., Muslims, which contradicts the image popular within multicultural literature that claims making for group demands is a way for migrants to express their cultural differences per se, which would lead one to expect a plethora of many different migrant identities being expressed.

We find a relatively low number of group demands made by migrant faith groups other than Muslims. Although Britain and the Netherlands have significant migrant populations of Hindu faith, who face exactly the same multicultural and state/religion policies as Muslims, there is little evidence for Hindus making group demands using religious identities (Netherlands, 6.7 percent; Britain, 2.3 percent). Likewise, the Jewish ethnoreligious group actually mobilizes less in the group demands field than they do overall. Jews make 2.2 percent of group demands in the Netherlands, 6.8 percent in Britain, and 8.2 percent in France, while chapter 3 showed they account for 8.1 percent of all claims making by Dutch migrants, 5.5 percent by British, and 19.6 percent by French migrants respectively (see Table 21). This low presence of group demands in the claims making repertoires of Jews stands in sharp contrast to Muslims, for whom between four-tenths and two-thirds of all claims making was for group demands (Netherlands, 50.0 percent; Britain, 67.5 percent; and France, 41.7 percent). Thus claims making for group demands appears to be specific to migrants identifying themselves as Muslims.

With respect to the differences between Jews and Muslims, one can point to the much longer history of political accommodation of Jews within Western European societies. In addition, the vast majority of Jews practice their faith, if at all, to the same limited extent as the vast majority of nominal Christians. Such factors may explain why Jews make few group demands relative to Muslims. However, such differences do not hold for Hindus, who came in the same waves of migration, from the same regions, and who have received similar levels of political and religious accommodation as

Muslims. Although Hinduism in some of its manifestations can promote values that are equally as incommensurable to liberal democratic values as Islam, Hindu group demands are largely invisible in the public domain.

We consider that the relatively low level of Hindu group demands compared to Muslims is a result of the different infrastructures of the two religions in their societies of settlement. Islam is a more collective and public religion, centered on the mosque, whereas there are many different types of Hinduism, traceable in part to regional or caste differences, and the home is often the principal location for worship in a religion that demands few public celebrations (Hiro 1991; Rex and Tomlinson 1983; Poulter 1998). As a nonproselytizing decentralized religion that is practiced privately, Hinduism as a new minority religion has fitted more easily within the political space granted. In addition, Hindu temples have not taken on the same functions for the migrant community of service provision and negotiating at the interface with the host political authorities that the mosque has for Muslims. As a consequence Muslim self-identification appears to be particularly resilient, even leading to demands for group rights and recognition in its own name.

In sum, we find important group-specific differences and an especially high propensity of group demands by Muslims. The key finding is that regardless of the differences in national contexts for attributing group rights, it is principally only Muslims who make group demands. We argue that this finding provides strong suggestive evidence that there is something about the relationship between liberal states and their Muslim migrants that leads to group demands. On one hand, it could be that there is something specific about the political position of Muslims in their societies of settlement that leads to claims making for group demands, independent of national context. Here, we hypothesize that *it is the public nature of the Islamic religion and the demands that it makes on the way that followers conduct their public lives that makes Islam an especially resilient type of identity and that results in claims making for group demands.* On the other hand, it could be that there is something specific in the way that liberal democratic states attempt to accommodate their Muslims that leads to group demands. Here, we hypothesize that *there are specific deficits in liberal states' cultural provision for migrant and religious group needs that impact disproportionately on groups who are practicing Muslims.* In order to investigate these questions, empirically and cross-nationally, we now undertake a detailed qualitative analysis of Muslims' group demands. First, however, we need to supplement our previous discussions on the cultural dimension of these countries' configurations of citizenship by looking briefly at how they have politically

accommodated religions, another important and related aspect of the relationship between states and migrants regarding cultural diversity, that has tended to be overlooked by much of the migration literature (see Statham forthcoming).7

The Political Accommodation of Islam

We saw in chapter 3 that the Netherlands, Britain, and France have employed different approaches to incorporating migrants, which appears to have striking impacts in shaping the general political self-identification of migrants. Liberal states make very little effort to convert migrants away from their religious beliefs, which are often held as a matter of individual conscience. Given our findings that multicultural debates in Europe tend to be about the position of Islam, we will now provide some detail on the different ways that our countries have attempted to accommodate religious differences within their political frameworks, in particular with respect to Islam.

Overall, of our three countries France grants least political space for religious differences to be expressed in public life. The French state is aggressively secular; the 1905 law separating church and state prevents the public funding and official recognition of religious communities, although it does affirm the principle of equality in the free exercise of religion for all French citizens. The French state sees displays of religious faith in the public domain as a challenge to the concept of laïcité, its own secular republican ideology for a universal undifferentiated citizenship extended to all its individual citizens. As a consequence, the interaction between the state and the visible presence of Islam, with mosques, minarets, and public calls to prayer, readily becomes a public controversy and a French-style clash of cultures. Over time the state has acceded to minimalist commitments to the basic requirements for Muslims to practice their religion, including prayer spaces and food requirements. However, the centralization and organization of Catholic, Protestant, and Jewish religious communities by the Napoleonic state was only fully replicated for the newcomer religion Islam in December 2002. Discussions had been ongoing since 1990 to establish a high authority of Islam and foundered many times on the insistence by politicians that such an institution would remain a strictly religious council and not become an institutional forum for political consultation (Laurence 2003). In the end, the French Council for the Muslim Religion was the first formalization of relations between Muslims and the state and is partially elected and partially appointed. After talks with seven Muslim federations and five large mosques, the council took on tasks of arranging chaplaincies in the army and prisons, acquiring burial sites, delivering halal meat certifi-

cates, organizing pilgrimages, and building new mosques and prayer halls. Nonetheless, this new institutional development has not quelled the political controversies between the state's upholding of the laïcité principle and the public visibility of Islam. In 2004, the French justice minister Perben barred a woman from a court jury for wearing a headscarf because he considered that open signs of religious commitment prevented the impartiality necessary in French courts. In the same year, and with the public support of President Chirac, the French Parliament passed a bill by 494 votes to 36 banning the Islamic headscarf and all other overt religious symbols from schools, a piece of legislation that was then passed on to the Senate.

In Britain, religious institutions receive no direct state support, and the role of religion in public institutions is relegated to a matter of private individual conscience, but the state does privilege its own Anglican religion within its understanding of politics. Thus more than twenty Anglican bishops sit in the second chamber (the House of Lords), and the Church of England, headed by the monarch, stands as the official national religion. The limit that British law sets in extending rights to migrant religions was most clearly demonstrated by the ruling in the Rushdie affair that blasphemy did not extend to Islam.8 A key feature of the Race Relations Act is that it basically attributes rights to secular and not religious groups of minorities. Although Britain has special laws with regard to racial discrimination, there are no parallel laws that make religious discrimination a crime.9 Furthermore, several ruling interpretations of the 1976 Race Relations legislation have steadfastly refused to extend group rights against discrimination to Muslims, although two ethnoreligious groups, Sikhs and Jews, have been legally considered ethnic groups since 1983.10 Thus even when the Commission for Racial Equality brought a case against an engineering firm that refused to employ Muslims because it saw them as extremists in 1991, the employer was found guilty only of indirect discrimination against the racial category of Asians, and his anti-Muslim sentiments went legally unpunished (Vertovec 1996, 177; Lewis 2002, 250). In some ways reminiscent of France, British multiracialism has been far from reticent in opposing the extension of group rights to Muslims. The state has only recently allowed state funding for a few Islamic faith schools, which Anglican, Catholic, and Jewish denominations have enjoyed for many years. In addition, there has been a concerted campaign by British Muslims and Race Relations campaigners to coin the phrase "Islamophobia" as a specific form of racism.11

As we saw in the last chapter, Dutch elites considered that integration is most likely to be accomplished through confident subcultures, making the preservation of minority cultures an essential part of their incorporation. In

the 1990s, Dutch minority policy moved away from this idealist undiluted multiculturalism and toward a more British-style focus on socioeconomic parity when the realization set in that maintaining group diversity could also mean structuring disadvantage for those groups. Nonetheless, the Dutch approach still retains important distinctive characteristics with the result that it offers a wider and deeper range of cultural opportunities for minority groups than Britain, which is important because it encouraged the preservation of a wide range of homeland, national, ethnic, and religious identities. The "pillarized" system of consociational politics has a tradition of delegating state prerogatives to religious communities. As a result, religious group rights extend much further than those granted in Britain so that, for example, religious groups have the legal right to government funding for their schools. This Dutch multiculturalism *avant la lettre* has gone a long way toward including religious minorities within its definition of the national political community, which fuses the religious and secular associational activities of groups in society. Thus the opening of Parliament is officially blessed by the leaders of the Netherlands' minority religions. We find a state-funded Islamic broadcasting network (Moslim-omroep), an Islamic pedagogic center, and more than forty Dutch Islamic schools, which are fully government funded with a regular Dutch curriculum. Just as the "old" Christian and Protestant pillars had their own state-sponsored semiautonomous institutions in education, health, welfare, and the public media, such rights could not be denied to the new cultural and religious minorities.

Among our three countries, there is sufficient variation to examine whether the different ways that states attribute rights through their political accommodation of migrants and religions have an impact in shaping Muslim claims making for group demands. Here the continuum runs from the Netherlands, which offers the strongest version of cultural pluralism by granting group rights and exemptions to a broad range of minority and religious groups, to France, whose civic universalism embodied in the principle of *laïcité* opposes all differentialism, with the object of making—to paraphrase Eugene Weber (1976)—"migrants into Frenchmen." Britain with its peculiar race relations formula comes in between, recognizing some degree of migrants' group rights through a broad state-sponsored ascriptive identity of race but not extending these privileges to minority religions. We now propose to examine the relationship between Islam and political accommodation through a detailed comparison of our samples of Muslim group demands.

The Challenge of Islam: Muslim Group Demands

Figure 6 shows the analytic dimensions of group demands that we apply in our qualitative comparison of the Netherlands, Britain, and France.

Following the discussion in the introduction, we distinguish between two types of group demands for rights: exceptional and parity. By "exceptional," we refer to those group demands for rights that are not already granted to other native cultural, minority, or religious groups. Claims for exceptional group rights demand something substantively new or a special exemption for the migrant or religious group, which, if realized, sets the group apart from all other groups. It is particularly challenging to the form of cultural pluralism sponsored by a country's policies because it demands group rights, and exemptions from duties, that go beyond those granted to other national minority and religious groups. For example, those claims relating to conflicts over Muslim women wearing the headscarf in French state institutions where religious symbolism is prohibited are examples of exceptional group rights demands. By contrast, parity demands for group rights request the same privileges and exemptions from duties that are already extended to other religious and minority groups. Here the group demand is for equality with other groups who are already granted special treatment. Such demands for parity are generally less challenging and easier to accommodate than exceptional ones, because they do not directly challenge the logic of the category system used by a country's migrant or church/state policies. They only demand that the privileges already granted to some minorities are extended to another migrant group. For example, if Turkish Muslims in Germany request state subsidies for religious and cultural organizations of the kind already granted to Jews, then this is a parity demand.

Not all group demands are for rights; there are group demands that are weaker and that simply mobilize the group's collective identity in the

Type of group demand	Exceptional, parity, or collective identity
Motivational impetus for group demand	Proactive or reactive
Level and form of protest action for group demand	Low, medium, or high level; Demonstrative, confrontational, or violent in form
Overall orientation	Acculturative or dissociative

Figure 6. Analytic dimensions of Muslims' claims making for group demands.

public domain rather than engaging in the context of rights on offer from a country's multicultural policies. An example of this would be the Islamic federation in Berlin denying that it had links with the extremist group Milli Görüş, stating, "we want to transmit the Islamic religion, not politics." This is not a demand for group rights made on the host state and society, but an assertion of group identity that is made in it. Our analysis will focus principally on cases of exceptional and parity group rights demands because these are more explicitly formulated, though we shall still refer to collective identity group demands where they are relevant.

Second, we consider the nature of the relationship between the state and native public on one side, and the Muslim group on the other, which produces a group demand. A proactive group demand is mobilized autonomously by the Muslim group independently from actions by the state and host society actors and is a more assertive form of claims making. Conversely, a reactive group demand is when it mobilizes in response to an intervention by state or native public actors, for example, when the state officially bans a form of religious expression in public places.

Third, we look at the type of action form used to mobilize a group demand. Here we use the standard social movement categorizations for protest action repertoires that range from conventional and demonstrative to confrontational and then to violent forms.

Overall, the strategic orientation of group demands may be either *acculturative* or *dissociative* in their relationship to a state's cultural pluralism. Acculturative claims making fits within the state's framework and policies for categorizing minority or religious groups, whereas dissociative claims making challenges the state's approach to minority and religious differences by making demands that go further than, or ignore, current formulations. In general, one would expect exceptional rights demands to be dissociative because they are the most demanding on the dominant host culture. They are subsequently also likely to lead to reactions by state institutions and native public discourses, which may result in conflicts. Parity rights demands also have a potential to become highly controversial and provoke strong host society and state reactions. However, parity group demands are more likely to be acculturative than exceptional demands because they try to fit into an existing framework of political accommodation.

The Netherlands: Islam Pushing for a New "Pillar"

The examples of Muslim group demands in our Dutch sample cover issues that are common to the literature on multiculturalism. Six cases refer to is-

sues about Islamic schools, six are about attempts to set up a Dutch imam school, and the remainder cover requirements and exemptions for halal meat, provision of religious and cultural centers, imams for Muslim prisoners, broadcasting rights for Muslims, and divorce by sharia law.

Of the group demands by Muslims in the Netherlands, sixteen of the twenty-one cases in our sample are claims for parity group rights with other groups, four of the cases are claims for exceptional group rights, and only one case stands outside the context of rights demands and mobilizes a collective identity.

Concerning the action forms used to mobilize demands, there is only a single case of protest. In this instance, the Aya Sofia Association and the Mosque Neighbourhood Association Milli Görüş in Amsterdam West organized a six-thousand-strong demonstration against the refusal of the borough government to permit a large cultural center. In all other cases, Muslims used conventional action forms for claims making, including public speeches and statements. This predominant use of conventional action forms gives a first indication of the receptiveness of Dutch multicultural politics to group demands.

At first glance, our findings fit the cozy image that Dutch group-based multicultural policies produce a pacified and acculturative form of group demands by Muslims. As we have seen, the Dutch state grants minority group rights almost automatically in a way that encourages migrants to see themselves as new groups with new group demands. Indeed, the Dutch political space is so receptive to group claims that even for Muslims, a group that other countries find difficult to accommodate, it is hard to make exceptional group rights demands. This is because the Dutch state appears ever willing to acknowledge another cultural religious pillar within its national political community, using the principle that what is already granted to some groups must therefore be extended to all groups.

Another finding that points to the confidence of Muslims in the Netherlands for making group demands is that seventeen of the twenty-one cases of Muslim group demands were proactive, compared to only three that were reactive and one that was neither. Again, this seems to point to the beneficial outcomes of the Dutch-style group-based multiculturalism that creates incentives for Muslims to make this type of demand. Before getting too carried away with the benefits of Dutch multiculturalism, however, it is worth looking more closely at specific examples of these claims and the nature of the controversies that they represent.

Turning to the exceptional group rights demands, a first example is where a separate Islamic Butchers' Association is set up with the claim

that Muslims are unable to follow the regular training and education of butchers because their faith prohibits them dealing with pork. Another exceptional group demand occurs when the Union of Moroccan Muslim Organizations in the Netherlands (Ummon) advocates educating imams in the Netherlands and providing education in the language and knowledge of Dutch society for foreign imams. These are good examples of Muslims in the Netherlands having the confidence to proactively demand new exceptions as a group in the belief that this will be straightforwardly accommodated by the state. Although they are examples of exceptional group rights demands, the strong group-based enforcement within Dutch multicultural policies means that overall these claims are acculturative rather than dissociative in nature, and unlikely to provoke reactions from the host society.

In contrast, it is the strength of the enforcement of the group rights principle by Dutch politics that actually causes another of our examples of exceptional group rights demands. In this case, Muslims challenge the consequences for them of the overliberal tendencies within Dutch multiculturalism. The Dutch Muslim Council and the Moroccan Women's Society come out publicly against the bill proposed by the secretary of justice to recognize and accommodate one-sided marriage dissolution according to the laws of immigrants' countries of residence. Here the dissociative basis of the Muslim demand is against the proposed policies of the Dutch state. In this example, the rosy image of the consequences of cultural pluralism Dutch-style begins to slip. Indeed, the biggest threat or challenge to the integrative capacity of the nation-state in this instance is from the overwillingness of Dutch policy makers to grant exceptional group rights rather than from the Muslims' group demands.

Looking now at some Dutch examples of Muslim demands for parity rights, it is clear that many of these would constitute demands for exceptional group rights in Britain and France. Thus the Islamic Broadcasting Foundation claims that its right to broadcast on the public channel is a good way of advancing the integration of Muslims into Dutch society. The Halal Food Foundation announces that it hopes to end the unreliable supply of ritually slaughtered meat for the Islamic consumer after being granted the right to introduce their own hallmark, a concession giving them a parity of rights with Jews. The Islamic Council of the Netherlands and researchers associated with the Islamic Chair of the University of Amsterdam make a demand that there should be between twenty-five and thirty imams employed in prisons. According to their research, this would bring Islam proportionally in line with other faith denominations. These examples demonstrate, first, the far-reaching sponsorship of group rights by the Dutch authorities,

and second, that this creates a political space and set of incentives for group demands by Muslims. This legitimation of group demands by Dutch multicultural policies has the effect of making those Muslim group demands seem officially benign that in Britain and France would most likely provoke reactions from states and native publics.

In the cases relating to training imams, we find the following group demands: The Center for Islamic Studies advocates state sponsorship for the education of imams on a par with that provided for Christian vicars and priests on the condition that the government does not interfere in the substance of the education. In a case already referred to, the Union of Moroccan Muslim Organizations in the Netherlands (Ummon) makes a request for additional Dutch-language training and knowledge of Dutch society as part of the education for imams. The holder of an Islamic professorial chair at a university comes out in favor of a Dutch imam education, as does a resident imam. Against this, the president of the Turkish–Islamic Cultural Federation strongly criticizes the proposals of the Dutch liberal member of Parliament Dijkstal to found a Dutch imam school. Here we find a range of different positions being expressed by leading organizations from different factions within the Muslim community, all in response to an agenda of group rights set by the state. These examples of claims making about imam education illustrate that Dutch state policies tend to promote controversies and competition over resources within different factions of the Muslim communities, rather than between the native population and Muslims.

Such factionalism within Muslim communities may lead to the proliferation of ever smaller denominations of groups who demand their own group rights from the state. Further evidence for this comes from our claims on Islamic schools. In one case, the Foundation of Islamic Primary Education (IQRA) demands that different denominations from within Islam have the right to separate schools.[12] In another, the headmaster of the Yunus Emre Islamic primary school in The Hague advocates that a new school should be founded for a more orthodox Islamic education. On the same matter, the Islamic School Board Association (ISBO), an umbrella organization for twenty-nine Islamic schools in the Netherlands, publicly rules that the distinction between whether a school follows liberal or orthodox Islamic teaching is unimportant. Once more, this issue demonstrates that Dutch multiculturalism encourages Muslims to set up ever smaller denominational groups by establishing new organizations that they expect will receive state recognition and subsidies. Also, the orthodox Islam that these smaller factions will teach is likely to reproduce the separatist tendencies

that will lead to Muslim communities that are internally cohesive but inward-looking, and which hardly fit into Dutch society. Here we witness once more that Dutch liberal multiculturalism lets community group rights take precedence over the national community. Such an approach takes Dutch society in a direction that may reproduce parallel and divided rather than cohesive societies.

Britain: Islam as a Challenge to Race Relations

In our group claims by Muslims in Britain, five cases relate to the issuing of a fatwa against Salman Rushdie for publishing the *Satanic Verses*.[13] Another five relate to the perceived stigmatization and lack of respect by the native population and within the public sphere for Islamic symbols and people. Of the remainder, a significant proportion are about the relationship between the state and the Muslim community, including claims about state subsidies and recognition for Islamic schools, religious education in state schools, antidiscrimination measures for Muslims, treatment of Muslims in state prisons, the suitability of social amenities provided by authorities for Muslims, and finally the political representation of Muslims.

Of the twenty-seven group demands, nine are for exceptional group rights, nine are for parity group rights, and nine do not make rights demands but mobilize collective identities. This differs from the Dutch case where most demands are for parity rather than exceptional rights. In general, this indicates that Muslims in Britain have more difficulty fitting their demands within the framework of state-sponsored multiculturalism than their Dutch counterparts.

Regarding the motivational impetus of Muslim group demands, we find a strong tendency for proactive claims in Britain, with twenty proactive cases, five reactive, and two unclassifiable, which is similar to the Dutch. This shows that British Muslims, like their Dutch counterparts, have sufficient incentives from their country's multicultural policies to assert themselves autonomously instead of simply reacting to issues raised by the state and host society. However, in contrast to Dutch Muslims' assertiveness, which was almost entirely acculturative and for parity demands, a significant proportion of assertiveness by British Muslims is dissociative and for exceptional demands (all nine cases of exceptional demands are proactive). Dutch multicultural policies appear to stimulate a type of Muslim proactivism for group demands that is easily absorbed by state authorities in a noncontested way. In contrast, the more restrictive British definition of multicultural group rights seems to produce a different type of proactive Muslim group demand that is more confrontational.

This confrontational nature of Muslim group demands in Britain is underlined by their action forms. In seven out of twenty-seven cases, Muslims use protest to mobilize their group demands, and five of these are confrontational or violent events. In one protest, Muslim youths gas bomb a bingo hall in Luton. They are protesting against a company called "Mecca" using its brand name on public display to promote gambling. In another, Muslim tenants launch a petition against Blackburn Council requesting that their toilets be repositioned so that they no longer face Mecca. In a further two cases, Muslim parents organize boycotts by their children of state schools against what they see as the harmful effects of comparative religion lessons in the national curriculum. In the last of the confrontational/violent protests, two hundred people attend a Nation of Islam (UK) rally, a black rights group.[14]

Turning to the nine exceptional group demands, all of which are proactive, three refer to the Rushdie affair and challenge the sovereign authority of the British state. In one case, the Muslim Parliament[15] appeals to the authority of Islamic law above British law: "He (Rushdie) has committed a capital offence. An Islamic legal authority has passed a judgement. It's just like a court passing a judgement in this country. The Muslim community feels that this judgement is right and legal." In others, again by the Muslim Parliament and by the Bradford Council of Mosques, anti-Rushdie sentiments are tempered by emphasizing that campaigns against the *Satanic Verses* should remain within British law. In another, a Muslim prisoner challenges the state's strip search method, arguing that he was entitled to maintain his religious beliefs and that a decision not to provide him with modest clothing was "unlawful and unreasonable." The boycott against comparative religion classes in the national curriculum, already mentioned, was supported by the Association of Muslim Schools, who argued: "If they get bombarded with different ideologies and different thinking, the Muslim child gets so clicked on to what the teacher is saying, that he or she thinks whatever the teacher is saying is the truth." The welfare provision of state authorities is the target of criticism in the other demands. For example, the Muslim Parliament argues that the Commission for Racial Equality is inadequate for addressing discrimination against Muslims and advocates the setting up of a Muslim welfare state. In one case, however, a nonstate actor is the target. Muslims in Nottingham criticize a shop owner for displaying shoes in his window that have verses from the Koran printed on them: "It is more serious than Salman Rushdie. Rushdie wrote a book which you carry in your hand. Here the holy name goes on the feet!"

These examples show that exceptional group demands by Muslims

do not fit easily in British race relations politics and are not easily accommodated by it. The demands we cite, in particular those on Rushdie, are highly incommensurable with the values of minority politics sponsored by the British state. This finding is evidence that there are aspects of Islamic religious belief that require rituals, practices, and the expression of beliefs in the public domain that British policies have difficulty accommodating and that lead to conflicts. According to our interpretation, this British Muslim assertiveness is not simply an inherent characteristic of Islamic belief systems but is an outcome shaped by the type of political opportunities produced by British-style cultural pluralism. As we discussed earlier, British Muslims achieve group rights as racial, ethnic, or national minority groups, but not as a religious minority group. Hence, Muslims are included as a special group in the political community only indirectly as ethnic or racial minority groups, and not directly as Muslims, which is how they see themselves. Living in a country with which they identify as much as other ethnic minorities,[16] Pakistani and Bangladeshi Muslims feel aggrieved that their preferred form of self-identification is not legally sanctioned. They see themselves as less protected from discrimination by the state than other minority groups and as believers of a faith that the state has been unwilling to uphold on a par with other minority religions. The comparison with the Netherlands is instructive. Whereas Dutch multiculturalism creates pressure for too many types of groups to be included in society, causing competition between minorities, British race relations leaves Muslims feeling excluded as a group, and they assertively make demands on a state that they perceive as relegating them to a second-class status in the national community.

This interpretation receives further support from our examples of parity group demands, which are more acculturative, and construct a vision of how Muslims would like to position themselves within the race relations framework. A first case appears in the context of the Runnymede Trust's consultation document on Islamophobia, which calls for radical changes in the attitudes of politicians, media, and community leaders to fight discrimination against "British Muslims [sic]." Here the Muslim College criticizes the state for not extending the same antidiscrimination measures to Muslims as it does for others, arguing that "the vast majority of our community want to live in this country and want to be citizens of this country. It is our right as citizens to be able to say to the country, 'Here, we think your policies are wrong.'" In another example after the 1995 Bradford race riots, Muslim community leaders and the Muslim Parliament claim that "Pakistanis are twice as likely to be unemployed than Afro-Caribbean or

Indian people; there is no other reason for this than discrimination or demonisation of Muslims." In a similar vein, two editors of Muslim newspapers criticize the suitability of the Commission for Racial Equality for Muslim racial problems; one states, "the Muslim population is doubly discriminated against firstly because of their skin colour, and secondly because of their religion." Such claims are not confrontational expressions of cultural difference per se, but constitute reasoned arguments for more space to be granted within British multiculturalism so that Muslims can act as full and equal citizens in the national community. Such examples are not atypical; in others, the UK Action Committee on Islamic Affairs calls on political parties to court the Muslim vote or face a profound cost to social harmony, and a local Islam society liaises with the borough council to better understand why there is less usage of leisure facilities by the Muslim community than other sections of the population.

Although these parity demands often use the civic language and terminology of race relations and express the aim of improving the integration of Muslims in British society, this does not mean that accommodating such group demands would be unproblematic. The Muslims' perceived grievances are not just about higher levels of discrimination than other minority groups in society experience, but about how to fit their religious faith community into the landscape of British civic values. This is what is meant by "double discrimination"—as a minority and as a religious group. In Britain, where the state relegates religious practice to a matter of private individual conscience, it is difficult to accommodate organizations that integrate the functions of civic association and religious faith provision in the public domain. As we discussed earlier, the public nature of religious practice and its overreaching into associational and political activities make Islam a special case among British minority religions.

In the last two cases of parity demands, the state's drive to provide a universal national education comes into conflict with Muslims for whom religion and faith is a way of life and not simply a ritual act or private belief. In one case, a Muslim father believes that Trafford Council discriminated against his daughter by paying fees for Catholic pupils to attend an independent Catholic school but not for his daughter to attend an independent Islamic school. An important difference between Catholics, and for that matter Jews and other minority religions, compared to Muslims is that in practice their religious denominational schools are for the most part religious in name but serve a largely secular population. We outlined earlier that the British state has been fairly consistently resistant to granting funding for Islamic schools compared to other faiths, even though there are now

a handful. The reason for this is the fear that ways of life that are founded on non-British values will be promoted by Islamic schools. Such a stance contrasts sharply to that of Dutch policy makers prior to their recent policy shift, and it defines the cleavage of race relations vis-à-vis Muslims. On the one side Muslims assert their civic credentials as British Muslims, aggrieved at what they perceive as the discrimination against them by the state and native society. And on the other, the state pretends that Muslims are part of the British community, but steadfastly refuses to grant them the group rights that they fear would foster a segregated community of religious zealots living outside of British law.

France: Islam in Response to *Laïcité*

In contrast to the Netherlands and Britain, the French sample of Muslim group claims is strongly shaped by one of the defining moments of the relationship between the French state and Islam, the headscarf controversy (*affaire du foulard*) in state schools. Fourteen of the twenty-five cases are demands that directly referred to wearing headscarves in public institutions, and four-fifths of these were made in 1993 or 1994, when this case was especially visible and resonant. The headscarf-related issues include calls for dialogue with and respect for all faiths and traditions, criticisms of the *circulaire Bayrou* in which a government minister ruled that headmasters could exclude pupils wearing the headscarf as an ostentatious sign of religion from state schools, protests against the exclusion of pupils for wearing headscarves, and calls for the establishment of private Islamic schools following these expulsions. Regarding the other issues, five refer to the comparative position of Islam relative to other monotheistic religions in French political life, a few concern the founding of Islamic universities for training imams, and the remainder concern religious education in schools and the building of mosques.

Concerning the type of group demands by French Muslims, most are for exceptional group rights (sixteen of twenty-five cases), only five are for parity group rights, and in four the group simply express their collective identity. In contrast to the Netherlands (less than a fifth) and Britain (a third), this higher proportion of exceptional group rights demands points toward cross-national differences, which reflect the different ways that the countries recognize cultural and religious groups. Whereas Dutch multiculturalism is open to all group demands, and British race relations is open to some group demands but not Muslims as "Muslims," the French republican secularism *laïcité* strongly resists all group demands, especially those

that are religious. An effect of this state-enforced *laïcité* is demonstrated by the orientation of French Muslims' group demands, which are predominantly dissociative in their relationship to the state's policies.

This overall dissociative nature of group demands in France is closer to the British case than the Netherlands. However, there are also differences between Britain and France in the way that group demands originate. British Muslim group demands are mostly proactive, whereas in France there are equivalent numbers of reactive (thirteen) and proactive (twelve) demands. In general, it appears that, like the British, French Muslims make group demands that confront the state authorities' policies for cultural pluralism. However, unlike the British, a significant proportion of French Muslims' group demands are made in response to actions by the French state. This shows a more defensive stance by French Muslims than their British counterparts and gives a first indication that it is the French state's assertiveness in applying a universalist and assimilationist approach to cultural pluralism that defines the context of claims making for group demands.

Perhaps surprisingly, given this apparently hostile institutional setting, we find fewer protest events for mobilizing group demands in France than in Britain, and all three French protests have demonstrative rather than confrontational or violent action forms. Each French protest event occurred in response to the expulsion of pupils from state schools for wearing the headscarf. In Grenoble, a thousand Muslims demonstrate outside the appeal committee hearing for a student excluded from class for wearing a headscarf during gym. As one placard makes clear, the protest is against "an antireligious *laïcism* that is a threat to social peace," whereas others assert the importance of the headscarf as an identity for Muslims in France: "France is my freedom, my foulard too" and "Muslim yes, French too." The other two examples of protests are by a hundred people against the expulsion of four pupils in Goissainville (Val d'Oise), and then another of about three hundred at Garges-lès-Gonesse, organized by the son of a director of the Association islamiste de Garges. In these instances, Muslims are defending what they perceive as their group rights against the assertive actions of the state authorities who are enforcing republican principles.

Looking at examples of exceptional group rights demands, we see more evidence for the defensive nature of group demands by French Muslims in the face of the enforcement of republican ideology by the state authorities. Twelve of the sixteen cases are reactive, and fourteen of the sixteen cases referred to headscarves. One non-headscarf example is a proactive demand by the Centre européen de recherché et d'information sur l'islam (CERISI)

for an Islamic university to train imams, to promote Islamic values, and to build a framework for Islamic associational activity. This is more akin to the types of demands that appear in Britain and the Netherlands.

The indivisible, undifferentiated universalism of French republican civic values is centered on the equality of the individual citizen and leaves very little political space for the expression of cultural group difference within politics. In addition, the strong statist secularism *laïcité* is an ideology that is antireligious, allowing virtually no space for any form of expression of religious faith within public institutional politics. Religious organizations in France are brought under the control of the state to ensure that they focus on purely religious matters and do not stray into the realms of political activity. Our headscarf cases provide important insights on the nature of these conflicts between Muslims' group demands for the public expression of Islamic identity on one side, and French institutionalized *laïcité* on the other.

In one case, Abdallah Ben Masour, general secretary of the Union des organisations islamiques de France (UOIF), declares at a gathering of three thousand to eight thousand that "*laïcité* must not be allowed to become a new religion, but a neutral space where liberty is given to everyone. A twelve-year-old child is presented by the media like an enemy of *laïcité* just because she wants to do her thing." In a similar vein, the UOIF affirms its support for the principles of *laïcité* but adds that this includes a respect for the right to difference *(droit à la différence)*. This demand occurs in response to minister of education Bayrou's declaration upholding the stance that wearing a headscarf is not to be permitted at state schools if it is used as an ostentatious religious symbol. In another instance, after the Conseil d'Etat annulled the exclusion of three girls suspended from school for wearing headscarves in Seine-Saint-Denis, Dalil Boubakeur, rector of the Grande Mosqée de Paris, called on Muslims to live in peace and mutual respect and in dialogue with their neighbors, but also expressed his satisfaction with what he interprets as this recognition by the state of Muslim specificity and respect for some of its traditions in the law. There are several examples of this kind, where the claim reaffirms the principle of *laïcité* but in doing so requests more space for the expression of cultural difference within it, often making clear, however, that this is an expression of culture not politics. A minority of cases are more separatist in their orientation and conclusions. In another response to the Bayrou declaration and the exclusion of pupils in Lille, the president of the regional Islamic council and of the Lille-Sud Mosque declares that he is scandalized by the level of rejection that appears on the back of the concept of

laïcité, and that now it is time to turn to private schools, as the state has left Muslims no other choice.

One would expect it to be anomalous to have a demand for exceptional group rights that is acculturative with respect to French *laïcité*. However, there is one case that is unusual but nonetheless revealing about French conflicts over Islam. Here the Union des jeunes musulmans (UJM) of Lyon publicly criticizes the state authorities who have stamped the identity card of a woman, which bore a photo of her wearing a headscarf, with the words "practicing Muslim" *(musulman très practicant)* in the distinguishing marks category. The UJM expresses its concern about the segregationist attitude of the authorities with respect to the French Muslim community *(la communauté musulmane française)* and demands equal treatment for all citizens of the country, whereby a principle for the liberty of cultural expression ought to be enforced within the framework of a well founded *laïcité*. Here the UJM use the republican principle of *laïcité* to denounce what they see as the possible stigmatization of French Muslims who may be singled out as a group by other sections of French society. They fear that being given the dubious exceptional right of being publicly demarcated as different on their identity cards may be used against them. Interestingly, the authorities dismiss this event as an individual error by a member of their staff, and reassert the indivisibility of French citizenship.

The examples that we have described show that conflicts over group rights in France are in many cases highly visible and resonant because they are located in institutional settings of interactions between the French state and Muslims. In the vast majority of cases, Muslims are responding to the actions of state authorities carried out in the name of republican *laïcité*. To explain why Islam faces such strong cultural opposition from the French state, it is important to see that the French state views Muslim associational activity as a double challenge to its authority. First, Islam is a group identity that allows the largest set of migrants to organize collectively within France, thus promoting precisely the type of sectional group political interests that are anathema to the French understanding of citizenship. Second, Islam is the faith of a significant section of the population who practice their religion and whose religious belief places certain demands and restrictions on the way that they approach the duties of the public life of the citizen. From this viewpoint, Islam allows the collective organization and promotion of a set of religious beliefs and values that challenge the politicized secularism of the state and its opposition to religious faith in the public domain.

In many of our cases, French Muslims make group demands that try to negotiate a degree of recognition for Islamic symbols and values within

the understanding of belonging to the French nation. This is also evident in their demands for parity group rights, which either refute religion by advocating a secular form of Muslim civic associationalism, or alternatively argue that religious practice is outside of the political realm. For example, the president of l'Union des familles musulmanes-Islam de France (UFM) argues that the family way constitutes an opposition to Islamic extremism and that the aim of this secular association is to reconcile the rights and duties of Muslims resident in France, the Arab culture (*la culture arabe*), and the French civil code. The claimant distinguishes here between a political Islam of extremism, which he rejects, and the potential contribution of civic associations of recognized secular minorities (of Muslims) to French political life. Expressing similar sentiments, the general secretary of the UOIF calls for an "Islam de France," arguing that it is a nonnegotiable prerequisite for engaging in French political life, that all allegiance to a foreign country must be renounced, and that the democracy, laws, and values of the republic must be respected. In another case concerning the role of Islam as a religion, the rector of the Paris Mosque expresses disappointment that the president of the republic has not invited a Muslim representative to his ceremony of good wishes (*voeux*) for the heads of the religions, alongside the archbishop of Paris, the head rabbi of France, and the president of the Protestant Federation. Nonetheless, he also uses this opportunity to make the point that the Paris Mosque was founded by a French state decree, and thereby tries to legitimate the principle that the state should take on the same relationship that it has with the other faiths by establishing a centralized Islamic religion. In our other cases, Muslims' demands for parity rights simply request the same basis for Islamic religion within France as the restricted role already granted to other faiths, namely, that they concentrate on worship not politics. Thus the aptly named Association pour le dialogue islamo-chrétien et les rencontres interreligieuses (ADIC, Association for an Islamo-Christian Dialogue and Interreligious Meeting) calls for "fraternité" (brotherhood—echoing the French state's motto *liberté, egalité, fraternité*) between the three monotheistic religions in France.

Our discussion shows that the strict separation between religion and politics that is enforced by the French state makes any publicly visible form of association by Muslims appear problematic and a challenge to the principle of *laïcité*. France, like Britain, is unwilling to accommodate political space for Muslims but is more forthright and explicit in enforcing this stance. Muslims in France have never been under any illusions that religious faith is not part of civic public life, and they are granted far fewer group rights in recognition of their status as discriminated migrants than

in Britain. In both countries, conflicts arise where state authorities interact with Muslim groups. British Muslims make demands for group rights that are more assertive than their French counterparts, who mostly defend their group against the state's public enforcement of *laïcité*. However, in both countries, Muslims make efforts to define Islam within national belonging. This is especially evident in France, where there are group demands for an "Islam de France," or a secular associational Islam, or a benign apolitical religious Islam, but very little evidence for separatist demands or expressions proclaiming the political authority of Islam over the state. Nonetheless, the French state's entrenched opposition to all religion in public life, on one side, and its suspicion that Islam entails political aspirations, on the other, leads to this ongoing problematic relationship between France and her Muslims.

Conclusion

This chapter set out to address the leading question regarding the nature of the challenge of group demands to liberal democratic states by undertaking a systematic comparative analysis of migrants' claims making in Britain, France, the Netherlands, Germany, and Switzerland. To our knowledge, we have been the first to test the assumptions underpinning the multicultural citizenship debates with empirical evidence drawn from a systematically retrieved sample of this scale and type. Our approach has allowed us to conduct a qualitative analysis of country cases that at the same time can be located within the macro picture of overall claims making on immigration and ethnic relations.

Our first important findings concern the scale of claims making for group demands and the self-identifications used by migrants to make them. Viewed quantitatively, our evidence shows that the prominence of group demands within the literature on multicultural citizenship appears to be widely exaggerated, at least with respect to the European context of postwar migration. Controversies over group demands were most prominent in Britain, but even there they accounted for only a 7.7 percent share of claims making over immigration and ethnic relations, and were least prominent in Germany and Switzerland, where the figure was a tiny 1.2 percent. This seems to indicate that the strong emphasis on group demands within the migration literature over the last decade has not been matched by reality. Far from the images of societies pulling themselves apart at the cultural seams (see, for example, Huntington 2002), the cultural difference of migrants in their European societies of settlement does not appear to be the main characteristic of their own claims making, nor does it appear to be on

a scale that would threaten the social cohesion of societies. However, as our qualitative analysis showed, this should not be interpreted as meaning that migrants' group demands are easily accommodated and unproblematic. To be fair, the objective of much literature on multiculturalism has been normative and theoretical rather than empirically based, but we nonetheless suspect that many scholars have tended to raise the high prominence of a few cases, such as the headscarf affair, to general theories about the integrative capacity of the liberal nation-state.

A second important point is that our evidence shows that group demands are not a general phenomenon. We found cross-national differences with virtually no claims making for group demands in Germany and Switzerland, the countries that have done least to make migrants into citizens and whose policies tend to keep migrants politically and culturally apart from the host society. From this we conclude that migrants have to receive some degree of incentives from host societies before they feel that they are sufficiently politically empowered to make demands for special treatment as a group within their societies of settlement. We found roughly the same modest levels of group demands in France, which officially shuns all recognition of minority identities, and the Netherlands, which goes out of its way to recognize a whole range of migrant identities, and Britain, which sponsors racial identification bur does not recognize migrants' religious identities. Contrary to previous research (Ireland 1994, 2000; Koopmans and Statham 1999a) and our general findings in chapter 3, this shows that, at least regarding claims making for group demands, there are important limitations on the degree to which nation-states have been able to shape migrants' political behavior in their own image.

On the surface, this finding seems to show that group demands are to a certain extent independent from a country's policy approach for accommodating cultural diversity. However, closer inspection of our data points to a specific exceptional case of claims making by groups using Muslim or Islamic self-identifications. Muslims made half or more of the group demands in Britain, France, and the Netherlands. This shows that European public controversies about claims for group demands are not about migrants' cultural differences per se, but arise from a specific contradiction of Islam in the liberal nation-state. We consider that one reason why Islam is less easily shaped and transformed by minority policies than other types of migrant identities is due to its fusion of civic and religious functions. This limited separation of civic and religious roles in public life becomes embedded institutionally in the infrastructure of the Muslim migrant communi-

ties, in particular through the activities of the mosque, which is the focus of community life and the community's interface with political institutions. While secular civic migrant associations would be directly confronted by minority policies and face incentives and pressures to adapt, state institutions make fewer attempts to transform the religious faith of migrants. The combination of civic and religious roles in Islam appears to make it a particularly resilient form of identification and a source for group rights demands. This resilience of Islam to political adaptation was demonstrated by comparison with another migrant religion, Hinduism. Muslim and Hindu migrants share similar characteristics: they settled in the same waves of postwar migration, they come from the same regions of origin with the same postcolonial traditions, and they have the same type of community structure based on familial ties and patron-client relationships. However, in contrast to Muslims, our data show that Hindus are largely conspicuous by their public absence. We argued that this Muslim exceptionalism was due to the more visible and public nature of the religion and the demands that it places on followers and their interactions with core public institutions.

To gain further insight into the nature of the challenge of claims making for group demands by Muslims in Western Europe, we undertook a qualitative cross-national comparison, summarized in Table 30. Our qualitative analysis of group demands by Muslims showed that the more open Dutch and the more restrictive British and French attempts to accommodate cultural difference had all encountered problems that are difficult to resolve. The proactive and acculturative nature of Islamic group demands in the Netherlands, mobilized by conventional action forms, stands in contrast to the dissociative Muslim claims making that we find in Britain and France.

Closer inspection reveals that the outcomes of Dutch multiculturalism do not support the notion that granting multicultural rights strengthens political integration in multiethnic societies. For a start, we find the Dutch state sometimes promoting group rights for Muslims that more liberal Muslim groups do not want. The secretary of justice's bill to allow one-sided marriage dissolution puts group law above national civic law by denying the individual equality of women. Here the famous Dutch tolerance seems prepared to sanction similar attitudes among the Islamic faith community—i.e., inequality of women—to the illiberal ones that it has long tolerated for decades from Protestant fundamentalists. This is only one case, but it is instructive about the impact of Dutch policies on associational activity by Muslims. The state grants so many group rights that being acculturating in the Dutch political context substantively means not being integrated into

the national community, and in some cases being separated from it. Dutch multiculturalism's toleration of Islam may lead to fewer public conflicts, but this can also be read as a lack of care for ensuring community cohesion. If the native Dutch communities are self-organized in their own pillars and their lives do not come into any institutional contact with Muslims, then why should they be bothered by Muslims' strange demands and odd-sounding customs? Precisely these problems and the fear that policies were structuring the disadvantage of minorities led to the shift in Dutch policy thinking toward a more British-style integrationist approach.

British Muslims are similarly assertive compared to their Dutch counter-parts. However, their group demands are more often for exceptional rights and dissociative. We find British Muslims mobilizing assertively, sometimes violently, and often in ways that directly target the workings and principles of state authorities. On one side, the state remains unwilling to grant rights to Muslims, fearing that the associational activities of the Muslim commu-nity cannot easily be included within its secular integrationist formula, not least because they aim to promote a political role for the Islamic faith. On the other, we also find incommensurable demands by Muslims that appear to make such fears well founded. To be fair, we also find a significant number of British Muslims' group demands that are made *within* the race relations framework and that would be relatively easily accommodated if Muslims were categorized as an ethnoreligion in British law. Nonetheless, we con-sider that it is unlikely that British multiracial politics will be able to ac-commodate Islam without ongoing conflicts.

Compared to the British, French Muslims are more reactive than asser-tive in mobilizing their demands on the state, lacking the degree of legiti-macy that accrues to British Muslims indirectly as a recognized minority. The advocacy of French Muslims for religious recognition is also more de-fensive. For example, while British anti-Rushdie claims making demands political recognition for the Islamic religion within blasphemy laws, the religious demands in France tend to be more acculturative, such as those made by the rector of the Great Mosque of Paris, which ask for little more than accommodation for Islam within the French state's system of con-trol for religious communities. We also found several examples of Muslims drawing on republican *laïcité* as the legitimating basis for their demands. The headscarf cases, the definitive events in our sample, showed that many claims are reactive against interventions by the state to ban the ostenta-tious display of religious symbols in public life. The institutional conflicts about the place of Islam in France are often brought forward by the state asserting its *laïcité*. We consider that this outcome of a more defensive than

Table 30. A summary of qualitative findings on Muslims' claims making for group demands, 1992–98

Rights granted	Netherlands	Britain	France
Formal citizenship	Yes	Yes	Yes
Minority group rights	Yes	Only racial and ethnic groups	No
Religious group rights	Yes	No	No
Muslim claims making			
Type of group demands	Parity	Exceptional and parity	Exceptional
Motivational impetus	Proactive	Proactive	Reactive/proactive
Relative level of protest	Low	High	Medium
Form of protest	Demonstrative	Confrontational/violent	Demonstrative
Overall orientation	Acculturative	Dissociative	Dissociative

assertive political Islam arises from the harsh political context that Muslims face for expressing their group differences. Attempts to turn Muslims into Frenchmen have shaped a sort of French Islam, but at the same time, this is not a pacified Islam that is able to disappear into the private realm of individual faith. The more Muslims see themselves as French citizens, the more they will demand their rights, first as a minority and then as a religious group. In time, French Muslims could become as assertive as their British counterparts, which would most likely provoke stronger state reactions.

In short, we tested three national approaches for the accommodation of Islam and found them all to be problematic, but in different ways. The Dutch case shows that attributing group rights too easily may result in migrant groups increasingly turning inward, identifying less strongly with the majority society, and becoming tied up in internal factional community politics. The British case suggests that the political participation of Muslims with group-specific incommensurable demands can lead to seemingly irresolvable conflicts. And the French case shows that strong assimilative pressures can push such migrant groups away from identification with the political process and into a choice between a neutered or politicized Islam.

This gloomy overall conclusion arises at least in part from the fact that Islam cannot simply be confined to religious faith but advances into the realm of politics where the state's authority and civic citizenship obligations reign supreme. However, it is important to note that this phenomenon of migration bringing new religious groups into the community of liberal democracies is not without historical precedent. For example, the large-scale immigrations of Irish Catholics in the nineteenth century, and then Jews from Eastern Europe, are important forerunners of distinct religious and ethnic migrant groups that over time the British nation-state incorporated into its self-understanding of the political community. Likewise, the political crisis brought by the Dreyfus affair in France and Karl Marx's reflections on the Jewish question bring to light that continental Europe has faced similar previous dilemmas with respect to their Jewish minorities. Although accommodating Islam will be marked by conflicts, it is perhaps better to have political conflicts over being part of a national community than to have resident minorities who see themselves separate from the native civil society. One possibility is that the passage of time will bring more "domesticated" nationalized forms of Islam, whose demands are more easily included within existing frameworks and whose believers share more of the secularized core values of the native majority publics. Alternatively, failure by political institutions to specifically recognize and include Islam may lead

to grievances and turn future generations of Muslims either toward political ideologies that challenge the West, such as radical Islam, or a life of alienation and anomie. Future outcomes will depend on the willingness of the Muslim communities to adapt and European states to negotiate viable forms of accommodation. For the time being, however, it seems clear that controversies over Muslim group demands are likely to go on and on.